

ENVIRONMENTAL MANAGEMENT SYSTEM MANUAL



MARINE CORPS BASE, CAMP SMEDLEY D. BUTLER

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VERSION 5

EMS 1

Approved By: _____

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Acronyms and Abbreviations

Acronym	Definition
CEMRB	Commanders' Environmental Management Review Board
CETEP	Comprehensive Environmental Training and Education Program
CMC	Commandant of the Marine Corps
CMEP	Centrally Managed Environmental Program
DLA	Defense Logistics Agency
DoD	Department of Defense
DoN	Department of the Navy
EAP	Environmental Action Plan
ECE	Environmental Compliance Evaluation
ECPSOP	Environmental Compliance and Protection Standard Operating Procedures
EM	Environmental Management
EMP	Environmental Management Program
EMS	Environmental Management System
EMSP	Environmental Management System Procedure
EO	Executive Order
EPA	Environmental Protection Agency
FIC	Facility Incident Commander
HAZMAT	Hazardous Materials
III MEF	III Marine Expeditionary Force
JEGS	Japan Environmental Governing Standards
JWTC	Jungle Warfare Training Center
MCAS	Marine Corps Air Station
MCB Camp Butler	Marine Corps Base Camp Smedley D. Butler
MCICOM	Marine Corps Installations Command
MCIPAC	Marine Corps Installation Pacific
MCO	Marine Corps Order
MSC	Major Subordinate Command
NGO	Non-Governmental Organization
NOV	Notice of Violation
OPS	Operational Plan Submission
P2	Pollution Prevention
PACO	Pacific Area Council Office
PAI	Practice-Aspect-Impact
PAO	Public Affairs Officer
POA&M	Plan of Action & Milestone
POM	Program Objective Memorandum
SABRS	Standard Accounting and Budgeting Reporting System
SOP	Standard Operating Procedure
SOFA	Status of Forces Agreement
SSPP	Strategic Sustainability Performance Plan
STEP	Status Tool for the Environmental Program

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Acronym	Definition
US	United States
USFJ	United States Forces Japan
USO	United Service Organizations
USMC	United States Marine Corps
WEBCASS	Web Compliance Assessment and Sustainment System

SECTION 1 - INTRODUCTION

1.1 Purpose

This manual documents the structure and function of the Marine Corps Base Camp Smedley D. Butler (MCB Camp Butler) Environmental Management System (EMS). The MCB Camp Butler EMS includes all activities, tenant commands, and contractors operating aboard MCB Camp Butler and Marine Corps Air Station (MCAS) Futenma. This manual serves as the primary source of guidance for the MCB Camp Butler EMS.

The EMS will improve environmental performance and mission support, contribute to overall efficiency, and clarify roles and responsibilities within the organization. Although improvement in environmental performance can be expected due to the adoption of such a systematic approach, it should be understood that the system is only a tool. Success of the EMS is dependent on a commitment to regular reviews and evaluations designed to identify opportunities for further improvement.

1.2 MCB Camp Butler EMS Manual Organization

This EMS Manual is organized into three Sections.

- Section 1.0 addresses the purpose, regulatory drivers and manual distribution.
- Section 2.0 provides general information on the scope of MCB Camp Butler's EMS including locations, missions and facilities and activities that comprise MCB Camp Butler.
- Section 3.0 documents the Environmental Management System Procedures (EMSPs) that implement the elements of the EMS requirements. Each EMSP contains the following sections:
 - Purpose and applicability
 - Definitions
 - Procedure. Description of the element and its relationships with other elements and maintenance of the element.
 - References and related documents

1.3 Regulatory Drivers

Executive Order (EO) 13423 requires EMS to be the primary management approach for addressing environmental aspects of internal agency operations and activities, including environmental aspects of energy and transportation functions.

The Department of Defense (DoD) Strategic Sustainability Performance Plan (SSPP) provides a coherent approach both for complying with multiple federal requirements for sustainability and establishing goals and performance expectations for the next decade. Consistent with these references, the MCB Camp Butler EMS is established to drive sustainability performance by making sustainable actions and thinking a part of everyone's daily job responsibilities. EMS provides a systematic approach to integrating environmental considerations and sustainability into mission decisions and operations, while continuing to improve environmental performance. Through sustainability and EMS, MCB Camp Butler is institutionalizing processes for continual environmental improvement and reducing risks to mission through effective and continual planning, review, and preventive and corrective action.

Marine Corps Installations Pacific (MCIPAC) Order 5090.1 requires the Assistant Chief of Staff (AC/S), G-F, MCIPAC to ensure installation EMS Manuals and other appropriate Environmental Program Plans supporting the EMS are developed, distributed and updated.

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1.4 Manual Distribution and Control

The EMS Manual can be found on the MCB Camp Butler Environmental SharePoint site at <https://wss.mcbbutler.nmci.usmc.mil/FE/ENV/default.aspx>. The EMS Manager is responsible for maintaining the EMS Manual under the direction of the EMS Director. Any revisions to the EMS Manual shall be routed to, authorized by, and distributed from the Environmental Affairs Branch in accordance with EMSP-09, Control of Documents.

SECTION 2 - GENERAL INFORMATION

2.1 Scope of MCB Camp Butler EMS

All activities and organizations located within the perimeters of MCB Camp Butler and MCAS Futenma are included in the scope of the MCB Camp Butler EMS. The following are exceptions. Japanese Facilities Improvement Program (JFIP) construction projects past the design stage are not included in the scope of the EMS, as MCB Camp Butler has no control or influence over these projects. After construction, the facility is included in the MCB Camp Butler EMS. Some non-Marine Corps tenants have developed and maintain their own EMS independent of the MCB Camp Butler EMS [e.g., U.S. Naval Hospital, the United States (US) Air Force, Defense Logistics Agency (DLA), etc.]. In these cases, MCB Camp Butler will validate, that the tenant has an acceptable EMS that does not conflict with the MCB Camp Butler EMS and is in compliance with applicable environmental policies and guidance. MCB Camp Butler will request annual audit results from all tenants that maintain their own EMS.

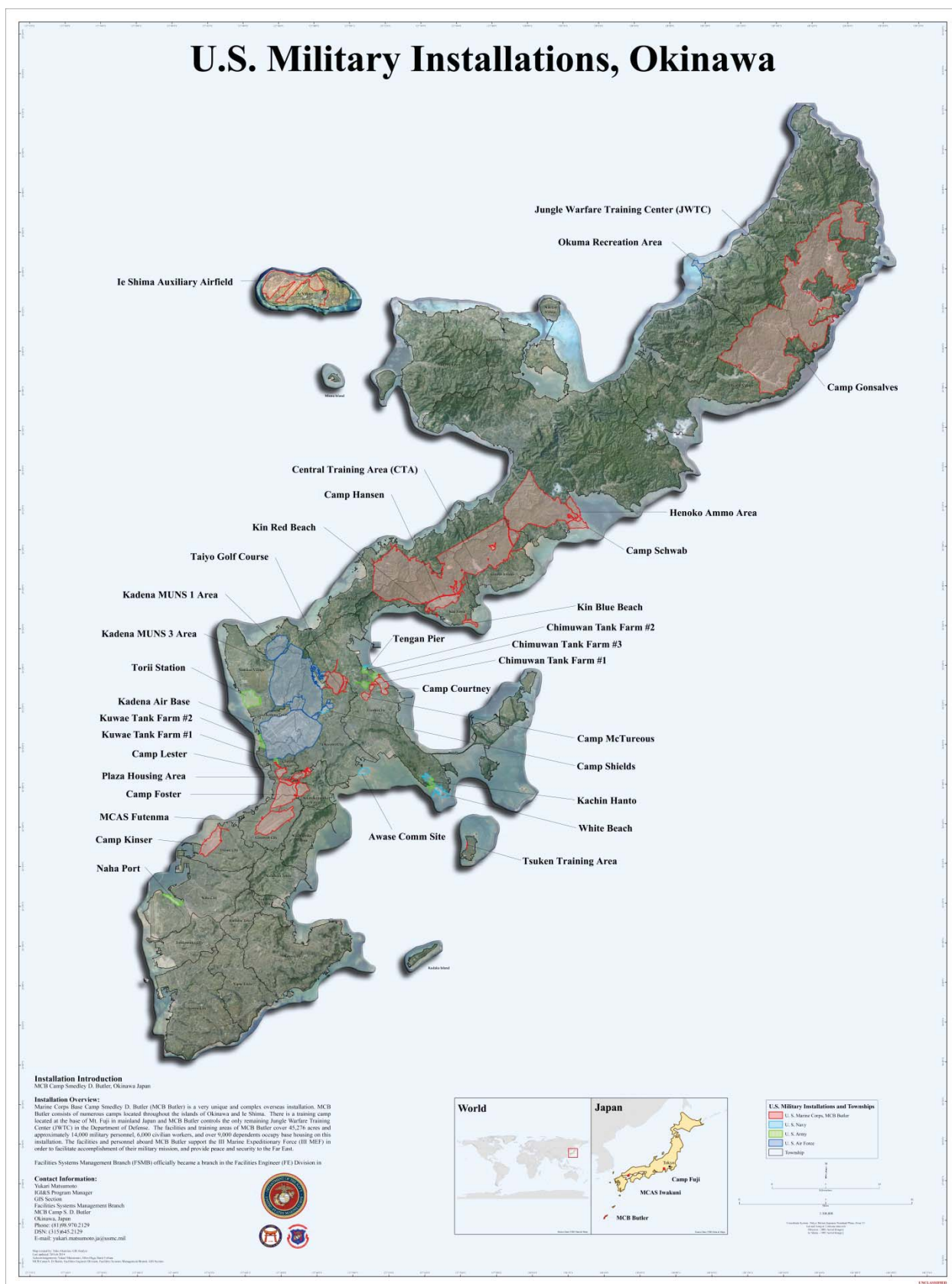
2.2 MCB Camp Butler/MCAS Futenma Location

MCB Camp Butler is a complex overseas installation in Japan, made up of several camps and training areas that are located on the islands of Okinawa (Figure 1). MCAS Futenma is located on the main island of Okinawa. MCB Camp Butler and MCAS Futenma are the support installations for III Marine Expeditionary Force (III MEF) forces on Okinawa, Japan. A detailed view of all military installations on Okinawa is shown on Figure 2.

Headquarters for Marine Corps Installations Pacific (MCIPAC) and MCB Camp Butler are co-located at Camp Foster. MCB Camp Butler (Figure 2) consists of: Camps Schwab, Hansen, Courtney, McTureous, Lester, Gonsalves, Foster, and Kinser. MCB Camp Butler also includes the Ie-Shima Auxiliary Airfield, Jungle Warfare Training Center (JWTC), Henoko Ordnance Ammunition Depot, Central Training Area (CTA), Kin Red Beach Training Area, Kin Blue Beach Training Area, and Taiyo Golf Club. MCB Camp Butler and MCAS Futenma are host to over 3,000 species of plants and animals, of which approximately 260 are rare, threatened or endangered. Some of these species are National Natural Monuments and are designated and protected under the Law for the Protection of Cultural Properties of Japan. Additionally, they contain archaeological sites that are over 6,000 years old.



Figure 1, Location of MCB Camp Butler and MCAS Futenma



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Figure 2, Location of U.S. Military Installations on Okinawa

2.3 Mission

The mission of MCB Camp Butler is to provide training facilities, logistical support, and administrative support for Fleet Marine Force units located on Okinawa. III MEF is the major tenant of MCB Camp Butler. III MEF's major components consist of the 3rd Marine Division, the ground combat component; 1st Marine Aircraft Wing, the air combat component; 3rd Marine Logistics Group, the logistics support component; III MEF Headquarters Group, command component; and the 31st Marine Expeditionary Unit.

The mission of MCAS Futenma is to provide, maintain and operate airfield facilities and services for the safe and efficient operational support of both 1st Marine Aircraft Wing and transient aircraft while fulfilling western pacific Operational Support Airlift requirements in support of III MEF/MCIPAC and to function as a United Nations Command (Rear) Airfield.

Additionally, the following support organizations, among others are located on various MCB Camp Butler camps throughout Okinawa: Army Air Force Exchange Service, Defense Logistics Agency (DLA), Department of Defense Dependents Schools, Marine Corps Community Services, United Service Organizations (USO), U.S. Naval Hospital Okinawa, and the Defense Commissary Agency.

2.4 MCB Camp Butler Facilities and Activities

Name	Major Activities
Camp Foster	Restaurants, Exchanges, Recreation, Medical & Dental Clinics, Commissary, Schools, Mess Halls, Vehicle Maintenance and Fueling, Facility Maintenance, Barracks, Logistical Support, Hospital, Administration, Small Unit Training, Natural and Cultural Resources, Hazardous Waste Storage Area
Camp Schwab	Restaurants, Exchanges, Recreation, Medical & Dental Clinics, Recreational Boating and Swimming, Mess Halls, Vehicle Maintenance and Fueling, Facility Maintenance, Barracks, Administration, Amphibious Operations, Aircraft Operations, Wastewater Plant, Ammunition Storage, Tacit Farms and Small Unit Training, Natural and Cultural Resources
Camp Hansen	Restaurants, Exchanges, Recreation, Medical & Dental Clinics, Vehicle Maintenance and Fueling, Facility Maintenance, Ordnance Maintenance, Wastewater Plant, Barracks, Logistics Support, Administration, Engineering, Small Unit Training, Aircraft Operations, Bulk Fuel Systems, Amphibious Training, Joint Forces Brig, Natural and Cultural Resources
Camp Courtney	Restaurants, Exchanges, Recreation, Medical & Dental Clinics, Recreational Swimming, Vehicle Maintenance and Fueling, Facility Maintenance, Barracks, Administration, Mess Hall, Wastewater Plant, Commissary, Natural and Cultural Resources.
Camp McTureous	Exchange, School, Natural and Cultural Resources

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Name	Major Activities
Camp Lester	School, Exchange, Recreation, Barracks, Water Plant, Natural and Cultural Resources
Taiyo Golf Club	Restaurant, Golf Course, Vehicle Maintenance and Fueling, Wastewater Plant, Natural and Cultural Resources
MCAS Futenma	Restaurants, Exchanges, Recreation, Medical & Dental Clinics, Mess Hall, Vehicle Maintenance and Fueling, Aircraft Maintenance and Fueling, Facility Maintenance, Logistics Support, Barracks, Administration, Aircraft Operations, Bulk Fuel Systems, Tacit Farms, Natural and Cultural Resources.
Camp Kinser	Restaurants, Exchanges, Recreation, Medical & Dental Clinics, Commissary, School, Mess Hall, Water Plant, Hazardous Material Issue, Hazardous Waste Storage Area, Corrosion Rehabilitation Facility, Bulk Storage, Cook/Chill Facility, Mortuary, Laundry, Vehicle Maintenance and Fueling, Facility Maintenance, Logistics Support, Barracks, Administration, , Natural and Cultural Resources
Camp Gonsalves & JWTC	Exchange, Mess Hall, Water and Wastewater Plant, Barracks, Administration, Fueling, Aircraft Operations, Small Unit Training, Natural and Cultural Resources
Ie Shima Auxiliary Airfield	Barracks, Administration, Aircraft Operations and Fueling, Boating Operations, Vehicle Maintenance and Fueling, Facility Maintenance, Small Unit Training, Tacit Farms, Wastewater Plant, and Natural Resources
Central Training Area	Small Unit Training, Aircraft Operations, Tacit Farms, Natural and Cultural Resources

2.5 MCB Camp Butler EMS

The MCB Camp Butler EMS is a framework of five interrelated components that together define and emphasize a process of continual improvement:

- **Policy** – Reflects the commitment of the Commander to the management of the organization's environmental affairs, including environmental compliance, pollution prevention (P2), natural/cultural resource management, minimizing risk to mission and continual improvement of the management system;
- **Planning** – Assessment of MCB Camp Butler's environmental footprint, analyzing and prioritizing risks to mission resulting from environmental impacts, developing objectives and targets for reducing environmental impacts and risks to mission, and identifying/implementing programs to achieve the targets;
- **Implementation** – Definition, documentation and implementation of responsibilities and procedures for sustaining the EMS, managing environmental programs, controlling practices, and

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managing environmental resources to enhance mission capabilities and improve environmental performance;

- **Checking and Corrective/Preventive Action** – Implement methods for tracking progress toward meeting objectives and targets: conduct EMS audits and environmental compliance evaluations; and
- **Management Review** – Annual review of the EMS by senior leadership, followed up by actions, including changes to the EMS, indicated by the review.

The procedures identified in Section 3 implement these five components.

2.6 Responsibilities

A consolidated responsibility listing by billet for the implementation and maintenance of the EMS is provided below.

2.6.1 Commanding General, MCB Camp Butler

1. Assign primary responsibility for implementation and maintenance of the EMS to the Assistant Chief of Staff, G-F, as the EMS Director.
2. Assign EMS Director to issue annual Self-Declaration of EMS Conformance.
3. Receive senior management environmental briefing (including EMS awareness).
4. Receive periodic updates appropriate to environmental issues faced by MCB Camp Butler.
5. Conduct an annual Commanders' Environmental Management Review Board (CEMRB) meeting to discuss MCB Camp Butler's EMS and environmental performance.
6. Establish new objectives and targets during the CEMRB meeting as appropriate.
7. Support implementation of Environmental Action Plans (EAPs) designed to track progress toward meeting objectives and targets.
8. Establish priority of projects needed to achieve objectives and targets through funding reallocation considerations.
9. Facilitate communication on environmental matters between MCB Camp Butler and its subordinate tenant commands.
10. Review non-conformance, corrective and preventive action results and direct corrective/preventive actions during management review.
11. Evaluate and approve, as appropriate, suggested revisions to the EMS.
12. Authorize and designate an MCB Camp Butler EMS Core Team.

2.6.2 III MEF Major Subordinate Commands (MSC) Commanders and Tenant Activities

1. Implement MCIPAC Environmental Policy.
2. Ensure that the MCIPAC Environmental Policy is adhered to and communicated to all employees.
3. Submit recommended changes to the MCIPAC Environmental Policy Statement to the MCIPACE EMS Core Team.
4. Know the significant environmental practices and aspects for their subordinate units and activities.

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5. Know MCB Camp Butler EMS objectives and targets and action plans for their subordinate units and activities.
6. Provide resources essential to implementation and control of the EMS.
7. Assign members to the CEMRB and EMS Core Team.
8. Receive senior management environmental briefing (including EMS awareness).
9. Receive periodic updates appropriate to environmental issues faced by MCB Camp Butler.
10. Ensure personnel receive appropriate training.
11. Facilitate communication on environmental matters between its units and MCB Camp Butler.
12. Review non-conformance, corrective and preventive action results and suggested corrective/preventive actions during management review.

2.6.3 EMS Director (AC/S G-F)

1. Review the MCIPAC Environmental Policy Statement on an annual basis or during CG, MCIPAC change of command.
2. Ensure that tenants include their subordinate units and Contracting Offices include contractors operating aboard MCB Camp Butler and MCAS Futenma into the EMS.
3. Ensure effective communication of environmental information between the Environmental Affairs Branch and units/activities.
4. Establish and ensure maintenance of the EMS Manual and procedures.
5. Ensure EMS requirements are established, implemented and maintained in accordance with EMS procedures.
6. Ensure the EMS manual is reviewed annually for its effectiveness in meeting EMS commitments.
7. Receive senior management environmental training (including EMS).
8. Ensure that Environmental Affairs Branch personnel are properly trained.
9. Issue annual Self-Declaration of EMS Conformance.

2.6.4 MCB Camp Butler EMS Core Team

Responsibilities are defined in EMSP-17, Management Review.

2.6.5 MCB Camp Butler Comptroller

Ensure consideration of EMS priorities and impacts of regulatory non-compliance when considering reallocation of environmental project funding to fund non-environmental initiatives.

2.6.6 EMS Manager (Environmental Officer)

1. Manage implementation of the EMS, including all EMSPs.
2. Maintain the MCIPAC Environmental Policy Statement as a controlled document per EMSP-09, Control of Documents.
3. Review and approve suggested MCIPAC Environmental Policy Statement revisions provided by Environmental Affairs Branch staff or other sources.
4. Coordinate with Public Affairs Officer (PAO) to ensure visibility of the MCIPAC Environmental Policy Statement to the public.

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5. Review this EMS procedure annually for its effectiveness in meeting EMS commitments.
6. Ensure that this manual is broadly distributed to all tenant units and activities on MCB Camp Butler and MCAS Futenma.
7. Review procedures annually for its effectiveness in meeting EMS commitments.
8. Ensure that Environmental Affairs Branch staff remains abreast of developments in rules and regulations affecting their areas of expertise.
9. Coordinate with United States Forces Japan (USFJ) for new developments in Japanese environmental law.
10. Identify record keeping requirements associated with all legal documents, records, and supporting plans, desktop procedures and technical manuals.
11. Annually review risk scoring and risk ranking data provided by EMS Coordinator.
12. Provide risk scoring and risk ranking data to MCB Camp Butler EMS Core Team.
13. Determine initial objectives and targets and action plans, and submit to the Core Team for approval.
14. Ensure that the Environmental Affairs Branch staff reviews progress of action plans quarterly to meet objectives and targets for environmental management programs and provide review comments to EMS Coordinator.
15. Ensure that adequate funding is planned, programmed, budgeted, and executed to meet MCB Camp Butler environmental requirements.
16. Ensure funding is requested for projects selected for implementation by the EMS Core Team.
17. Clearly establish roles and responsibilities of Environmental Affairs Branch personnel in accurate position descriptions.
18. Conduct annual performance reviews to evaluate the performance of each program manager and other Environmental Affairs Branch staff.
19. Establish and maintain environmental programs to ensure compliance and to meet environmental objectives and targets.
20. Annually review roles and responsibilities of Environmental Affairs Branch staff for supporting EMS.
21. Support the Environmental Affairs Branch staff in establishing and documenting their environmental roles and responsibilities in their turnover folders.
22. Assign an EMS Coordinator.
23. Ensure that adequate funding is planned, programmed, budgeted, and executed to meet MCB Camp Butler environmental requirements.
24. Provide, via the Marine Corps Fiscal Director, MCB Camp Butler financial and budget exhibits in support of the CMC (LF) submission of overall Marine Corps environmental funding information to DoN, DoD, and Congress.
25. Ensure life-cycle economic analysis is conducted before decisions are made about options for complying with environmental requirements.
26. Ensure the implementation and use of Status Tool for the Environmental Program (STEP) to monitor and track environmental requirements and costs.

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27. Use STEP to provide Operational Plan Submission (OPS) to CMC (G-F) annually.
28. Use STEP to provide a Program Objective Memorandum (POM) to CMC (G-F) biennially.
29. Provide a message to CMC (G-F) requesting concurrence if the reprogramming of Centrally Managed Environmental Program (CMEP)-funded environmental projects is required.
30. Ensure the implementation and use of Standard Accounting and Budgeting Reporting System (SABRS) to monitor and track the execution of funds.
31. If environmental funding is reallocated for non-environmental initiatives, brief the Commander on the regulatory impacts of non-compliance for failure to fund environmental initiatives.
32. Periodically evaluate manpower dedicated to environmental management and realign roles and responsibilities as indicated by MCB Camp Butler objectives and targets and improvements planned for EMS elements.
33. Continually identify training needs for personnel.
34. Incorporate EMS awareness training for all staff and contractors whose practices significantly impact the environment in the Comprehensive Environmental Training and Education Program (CETEP) Plan.
35. Provide training tools, such as videos, posters, and the intranet to training officer and supervisors.
36. Serve as the primary EMS point-of-contact for the organization.
37. Communicate status and issues of environmental programs and the EMS to the EMS Core Team.
38. Coordinate actions associated with environmental programs and the EMS with managers of non-environmental functions through direct communication or through participation in the MCB Camp Butler EMS Core Team.
39. Coordinate with PAO regarding environmental communication with the public or other external stakeholders.
40. Remain apprised of and coordinate with Environmental Affairs Branch staff regarding regulator visits and regulators' interests in operations aboard MCB Camp Butler and MCAS Futenma.
41. Review MCB Camp Butler's Spill Response Plan annually and update as needed.
42. Annually review and revise the MCB Camp Butler environmental document inventory.
43. Ensure all environmental documents are current and available to appropriate MCB Camp Butler personnel.
44. Ensure obsolete documents are removed from circulation and replaced with current versions.
45. Develop and maintain a list of MCB Camp Butler environmental records to be maintained in accordance with applicable requirements and EMS goals.
46. Ensure that Environmental Affairs Branch staff is available and prepared to assist practice owners in incorporating practice controls into instructions and SOPs.
47. Define environmental performance monitoring requirements and ensure that performance monitoring is conducted.
48. Provide appropriate reports to interested parties on the results of monitoring.
49. Review EMS and Regulatory Compliance Audit Reports prepared by the lead auditors.
50. Ensure an annual EMS audit is conducted.

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51. Maintain a list of certified EMS auditors.
52. Provide the results of non-conformance, corrective and preventive action activities, including suggested corrective/preventive actions, to the Installation Commander and the EMS Core Team to support EMS and regulatory compliance audits and management review.
53. Report on the performance of the EMS to the CEMRB.
54. Implement EMS improvements approved by the Commander.
55. Ensure that environmental documents are revised to reflect improvements specified by the Commander.

2.6.7 MCIPAC Safety Director

1. Coordinate with USFJ for new developments in Japanese occupational health and safety law.
2. Identify record keeping requirements associated with all legal documents, records, and supporting plans, desktop procedures and technical manuals.
3. Clearly establish roles and responsibilities of the Installation Safety Office personnel in position descriptions.
4. Conduct annual performance reviews to evaluate the performance of each program manager and other safety staff.
5. Annually review roles and responsibilities of Installation Safety Office staff for supporting EMS.
6. Support the Installation Safety Office staff in establishing and documenting their environmental roles and responsibilities in their turnover folders.
7. Identify training needs for personnel regularly.
8. Develop creative training techniques.
9. Provide training tools, such as videos, posters, and the intranet to training officer and supervisors.
10. Ensure control of documents pertaining to environmental programs assigned to the Installation Safety Office.
11. Annually review and revise the Installation Safety Office document inventory.
12. Ensure all documents are current and available to appropriate MCB Camp Butler personnel.
13. Ensure obsolete documents are removed from circulation and replaced with current versions.
14. Develop and maintain a list of Installation Safety Office records to be maintained in accordance with applicable requirements and EMS goals.
15. Participate in the CEMRB, as requested by the Commander.
16. Participate as a member of the EMS Core Team in support of the EMS.

2.6.8 Fire Chief

1. Ensure that the senior fire official responding to an incident is designated as the Facility Incident Commander (FIC) for any spills reported or discovered to the Fire Department.
2. Develop and coordinate emergency preparedness and response procedures across all levels and functions at MCB Camp Butler.
3. Activate other outside response team members as required.

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4. Review MCB Camp Butler's Spill Prevention and Response Plan annually and provide input to the EMS Manager.

2.6.9 CETEP Coordinator

1. Conduct training needs assessment to identify training requirements.
2. Provide environmental and EMS training to all staff and contractors whose work is associated with significant environmental aspects/impacts.
3. Determine the means by which competency is assessed.
4. Review courses of instruction annually or when new regulations are received.
5. Incorporate informal training opportunities in MCB Camp Butler's CETEP Plan.
6. Maintain environmental training records as required by regulations.

2.6.10 Environmental Compliance Officer

1. Develop and maintain annual EMS and Compliance Audit Schedule.
2. Prepare an audit plan, ensure audit procedures are followed during audits, and prepare audit reports.

2.6.11 EMS Coordinator

1. Provide recommendations to the EMS Core Team for the MCIPAC Environmental Policy Statement revisions.
2. Support distribution of the MCIPAC Environmental Policy Statement by posting on installation bulletin boards, websites, briefs, verbal communication, or other means.
3. Ensure the practice inventory is maintained and reflects new or changing practices executed on MCB Camp Butler and MCAS Futenma.
4. Provide results of risk ranking to the EMS manager for review.
5. Review risk rankings at least annually and ensure any new or modified practices identified in the practice inventory receive risk analysis.
6. Identify necessary actions to achieve environmental objectives and targets.
7. Present action plans reflecting progress in achieving objectives and targets to the EMS Core Team annually.
8. Provide technical and management support to the EMS Core Team.
9. Maintain environmental documents in accordance with applicable requirements and EMSP-09, Control of Documents.
10. Ensure reviews of documents are conducted at required intervals.
11. Identify and maintain environmental records in accordance with EMSP-15, Control of Records.
12. Ensure the EMS Manual is reviewed least annually and updated when needed to reflect changes in mission and improvements to the EMS.
13. Receive and record suggestions for improvement of the EMS and the EMS Manual.
14. Advise the EMS Core Team of suggestions for improvement of the EMS and the EMS Manual.
15. Maintain document control of the EMS Manual on behalf of the EMS Core Team.

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16. Annually compile and synopsize information regarding: progress in meeting environmental objectives and targets; results of environmental self-audits and related non-conformance, corrective and preventive action documentation; results of regulatory inspections, Marine Corps Installations Command (MCICOM) ECEs, and any other external assessments conducted in the preceding year; and corrective and preventive actions implemented to resolve compliance deficiencies.
17. Present information and recommendations to the EMS Core Team and EMS Manager.
18. Facilitate meetings to review the EMS Core Team's and EMS manager's responses to the information and recommendations.
19. Prepare the EMS and Regulatory Compliance Audit results and recommendations.
20. Conduct non-conformance, corrective and preventive actions on problems related to EMS elements.
21. Provide documents pertinent to the status of MCB Camp Butler's environmental performance to the CEMRB.

2.6.12 Facilities Systems Management Branch (FSMB) Information System Coordinator

1. Grant access to Environmental Affairs Branch EMS electronic directories.
2. Provide Geographic Information System support.
3. Provide Global Positioning System support.
4. Provide programming support.

2.6.13 Environmental Program Managers

1. Provide to EMS Manager recommendations for the MCIPAC Environmental Policy Statement revisions.
2. Support distribution of the MCIPAC Environmental Policy Statement through posting on installation bulletin boards, verbal communication, or other means.
3. Coordinate with the EMS Manager and command legal counsel, as appropriate, for assistance in determining and verifying applicability of new or revised requirements to MCB Camp Butler environmental programs, and in coordinating MCB Camp Butler's response.
4. Provide information on new requirements, with guidance, to legal counsel as appropriate.
5. Disseminate information on new requirements to applicable practice owners.
6. Follow-up to ensure responses from practice owners (incorporation of requirements into instructions and SOPs and any appropriate changes in operations) are adequate and appropriate.
7. Consult with Camp/Station Environmental Coordinators regarding characterization of aspects and impacts of practices executed on MCB Camp Butler.
8. Conduct risk analysis for each environmental aspect identified in the practice inventory at the environmental program level.
9. Review risk rankings at least annually and ensure any new or modified practices identified in the practice inventory receive risk analysis.
10. Follow action plans to gauge progress in meeting objectives and targets as appropriate to their program area or area of expertise.

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11. Provide review comments, with suggested revisions to objectives and targets, to the EMS Manager.
12. Support practice owners in implementing EAPs.
13. Identify necessary actions to achieve environmental objectives and targets and to solve problems for environmental programs.
14. Execute actions as assigned and document implementation, results, and follow-up evaluation.
15. Coordinate with the EMS Manager and practice owners to establish and document environmental roles and responsibilities for practice controls.
16. Manage assigned environmental programs.
17. Maintain environmental media program management plans, as appropriate.
18. Develop and maintain turnover folder(s) for the responsibilities listed in position description for approval by the EMS Manager.
19. Ensure practice owners participate in applicable environmental programs. Provide technical assistance as needed.
20. Coordinate with the EMS Manager in monitoring status of and resolving issues with assigned programs.
21. Identify environmental requirements and enter them in STEP.
22. Conduct life-cycle economic analysis before decisions are made about options for complying with environmental requirements.
23. Use STEP to monitor and track environmental requirements and costs.
24. Use STEP to provide OPS to CMC (G-F) annually.
25. Use STEP to provide a POM to CMC (G-F) biennially.
26. Use SABRS to monitor and track the execution of funds.
27. Provide on-the-job environmental training to practice owners.
28. Provide informal training to practice owners during self-audit compliance inspections
29. Include training requirements in compliance inspections and checklists.
30. Ensure practice owners are aware of training needs and the training materials and venues available to them.
31. Communicate status of and issues with environmental programs to the Environmental Officer and appropriate practice owners.
32. Participate in Marine Corps, Navy, USFJ, DoD or industry environmental conferences, committees, workgroups, seminars, symposia and forums pertinent to assigned area(s) of responsibility and communicate results or developments to appropriate MCB Camp Butler personnel.
33. Identify and maintain environmental documents/records in accordance with applicable requirements, EMSP-09, Control of Documents and EMSP-15, Control of Records.
34. Collaborate with practice owners to identify practice controls and to translate requirements into procedures and checklist questions.
35. Review practice owners' revised instructions and SOPs for accuracy.

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36. Suggest revisions to the EMS Manual based on experience in implementing the EMS in assigned environmental programs and across MCB Camp Butler and MCAS Futenma.
37. Communicate suggested changes to the EMS Coordinator.
38. Monitor the condition of natural and cultural resources.
39. Conduct sampling and analysis as required.
40. Effect non-conformance, corrective and preventive actions on widespread or recurring deficiencies with environmental programs or practice controls.
41. Implement EMS and program management improvements approved by the Commander.
42. Document EMS and program management improvements in environmental documents.

2.6.14 Camp/Station Environmental Coordinators

1. Review the practice risk rankings and proposed objectives and targets.
2. Validate projects and actions for relevance to targets and ensure that responsible parties and schedules are specified.
3. Identify necessary actions to achieve environmental objectives and targets for EMS maintenance and improvement.
4. Execute administrative and project-related actions for EMS maintenance and improvement, and document implementation, results, and follow-up evaluation.
5. Ensure practice owners participate in applicable environmental programs. Provide technical assistance as needed.
6. Document any changes in EMS practices and submit changes for approval, if necessary.
7. Comply with responsibilities assigned in plans.
8. Follow up on emergency incidents with practice owners to determine causes and implement corrective and preventive actions per EMSP-14, Problem Solving.
9. Distribute information from emergency preparedness and response plans to the appropriate practice owners.
10. Work with practice owners to develop emergency preparedness and response measures for new and modified practices.
11. Provide environmental briefing to all incoming Camp Commanders and tenant unit commanders.

2.6.15 Public Affairs Officer

1. Make the MCIPAC Environmental Policy Statement available to the public, in coordination with the EMS Manager.
2. Serve as the point-of-contact for communication with the local media.

2.6.16 G-7

Serve as the point-of-contact for communications primarily between local government agencies/activities, inclusive of regulatory agency communications.

2.6.17 Staff Judge

Serve as the point-of-contact for communications through the Freedom of Information Act (FOIA).

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2.6.18 Pacific Area Council Office (PACO) Counsel

Provide environmental legal advice and counsel.

2.6.19 MSC & Tenant Activities Environmental Representatives

1. Communicate the MCIPAC Environmental Policy to all hands.
2. Ensure that organization actions are consistent with and support the implementation of the MCIPAC Environmental Policy Statement.
3. Coordinate with MCB Camp Butler Environmental Affairs Branch staff to determine applicability and implications of new or changing environmental requirements.
4. Alert Environmental Affairs Branch staff of emerging or changing requirements and issues that may impact the environment.
5. Ensure that the significant environmental practices and aspects are adequately communicated to all units.
6. Notify Camp/Station Environmental Coordinator of any changes in operations or new operations that may affect the environment.
7. Be aware of practices that receive high-risk prioritization scores.
8. Ensure that objectives and targets, including the timeframe and means by which they will be achieved, are communicated to subordinate/tenant units and activities.
9. Identify necessary actions to achieve environmental objectives and targets for control of their practices, aspects, or impacts.
10. Execute actions as assigned and document implementation, results, and follow-up evaluation.
11. Participate in environmental programs, as required by assigned roles and responsibilities, regulations, and policy.
12. Communicate concerns about environmental program issues, roles and responsibilities to Environmental Affairs Branch staff and to Camp/Station Environmental Coordinator.
13. Execute actions to control practices and their aspects and impacts.
14. Seek and receive environmental training appropriate to assigned duties, as required by regulations.
15. Maintain personnel training records.
16. Receive on-the-job environmental training from Environmental Affairs Branch staff pertinent to environmentally sound practices.
17. Provide on-the-job environmental training for operators in conjunction with other subjects encompassed in command or unit instructions and SOPs.
18. Communicate environmental concerns and issues to Environmental Affairs Branch staff.
19. Defer communication with environmental regulatory officials and representatives of the general public to Environmental Affairs Branch personnel.
20. Communicate with Environmental Affairs Branch staff to maintain the currency and applicability of command/unit instructions, SOPs, and training.
21. Incorporate responsibilities for emergency preparedness and response relative to unit/activity practices into instructions, SOPs, and training.

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22. Call 911 for any spills that cannot be promptly and properly handled by the responsible unit or activity.
23. Notify Environmental Affairs Branch staff and Camp/Station Environmental Coordinator of new or modified practices and determine jointly what response measures are needed.
24. Conduct periodic testing of procedures.
25. Identify and maintain environmental documents/records in accordance with applicable requirements, EMSP-09, Control of Documents and EMSP-15, Control of Records.
26. Collaborate with Environmental Affairs Branch staff to identify practice controls and to translate requirements into procedures and checklist questions.
27. Assign responsibilities and determine schedules for practice controls.
28. Incorporate practice controls into unit instructions and SOPs.
29. Update instructions and SOPs as necessary.
30. Communicate suggested revisions to the EMS and the EMS Manual to representatives on the EMS Core Team.
31. Participate in sampling, monitoring and measuring initiatives relevant to unit/activity practices or SOPs.
32. Support the annual self-audit conducted during the Environmental Compliance Evaluation (ECE).
33. Collaborate with Environmental Affairs Branch staff in conducting non-conformance, corrective and preventive action activities as they relate to unit/activity practices.
34. Support the quarterly EMS Core Team meeting as requested.

2.6.20 Command/Unit Practice Owners

1. Communicate the MCIPAC Environmental Policy to all hands.
2. Ensure that organization actions are consistent with and support the implementation of the MCIPAC Environmental Policy.
3. Read, understand, and follow notices of new or changing rules or regulations received from the Environmental Affairs Branch staff as applicable to practices.
4. Maintain awareness of the implications of current environmental requirements that are pertinent to duties and ability to operate in an environmentally sound manner.
5. Operate in compliance with current environmental requirements.
6. Modify department/unit instructions, SOPs, checklists, and training as appropriate to reflect new requirements.
7. Ensure that the significant environmental practices and aspects are adequately communicated to all hands.
8. Provide practice inventory information to Camp/Station Environmental Coordinator for new practices and for modifications to existing practices.
9. Notify Camp/Station Environmental Coordinator of any changes in operations or new operations.
10. Be aware of practices and aspects that receive high-risk prioritization scores.
11. Ensure that objectives and targets, including the timeframe and means by which they will be achieved, are communicated to all shop personnel.

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12. Identify necessary actions to achieve environmental objectives and targets for control of practices, aspects, or impacts.
13. Execute actions as assigned and document implementation, results, and follow-up evaluation.
14. Participate in environmental programs, as required by assigned roles and responsibilities, regulations, and policy.
15. Communicate concerns about environmental program issues and roles and responsibilities to the Environmental Affairs Branch staff and to Camp/Station Environmental Coordinator.
16. Execute actions to control practices and their aspects and impacts.
17. Contact the Camp/Station Environmental Coordinator when facilities, equipment or process changes occur.
18. Manage processes to prevent adverse impacts on the environment in accomplishing missions.
19. Seek and receive environmental training appropriate to assigned duties, as required by regulations.
20. Maintain personnel training records.
21. Receive on-the-job environmental training from Environmental Affairs Branch staff pertinent to environmentally sound practices.
22. Provide on-the-job environmental training for operators in conjunction with other subjects encompassed in command or unit instructions and SOPs.
23. Communicate environmental concerns and issues to Environmental Affairs Branch staff.
24. Defer communication with environmental regulatory officials and representatives of the general public to Environmental Affairs Branch personnel.
25. Communicate with Environmental Affairs Branch staff to maintain currency with applicable command/unit instructions, SOPs, and training.
26. Incorporate responsibilities for emergency preparedness and response relative to practices into instructions, SOPs, and training.
27. Call 911 for any spills that cannot be promptly and properly handled.
28. Notify Environmental Affairs Branch staff and Camp/Station Environmental Coordinator of new or modified practices and determine jointly what response measures are needed.
29. Conduct periodic testing of procedures.
30. Identify and maintain environmental documents/records in accordance with applicable requirements, EMSP-09, Control of Documents and EMSP-15, Control of Records.
31. Collaborate with Environmental Affairs Branch staff to identify practice controls and to translate requirements into procedures and checklist questions.
32. Assign responsibilities and determine schedules for practice controls.
33. Incorporate practice controls into unit instructions and SOPs.
34. Provide Camp/Station Environmental Coordinators with suggestions to update instructions and SOPs as necessary.
35. Communicate suggested revisions to the EMS and the EMS Manual to representatives on the EMS Core Team.

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36. Participate in sampling, monitoring and measuring initiatives relevant to practices or SOPs.
37. Collaborate with Environmental Affairs Branch staff in conducting non-conformance, corrective and preventive action activities as they relate to their practices.

2.6.21 All Personnel aboard MCB Camp Butler and MCAS Futenma

1. Be aware of the MCIPAC Environmental Policy Statement, particularly as it pertains to assigned duties.
2. Adhere to procedures and policies established under the EMS.
3. Attend job related environmental training as required.
4. Communicate environmental issues to Environmental Affairs Branch staff.

2.6.22 Visiting Units

1. Adhere to procedures and policies established under the EMS.
2. Receive environmental awareness briefing upon arrival.
3. Communicate environmental issues to Environmental Affairs Branch staff.

2.6.23 Contracting Offices (Resident Officer in Charge of Construction, Regional Contracting Office, MCCA Contracting Officer, etc.)

1. Read and understand MCIPAC Environmental Policy Statement.
2. Ensure contractors conduct work in compliance with environmental regulations and in conformance with EMS requirements and the MCIPAC Environmental Policy Statement.
3. Ensure contractors read and understand the Contractor/Vendor EMS and Environmental General Awareness Training Guide for Marine Corps installations on Okinawa.
4. Ensure contractors complete all applicable environmental training and maintain associated records as per contract requirements.
5. Ensure contractors maintain awareness of the implications of current environmental requirements that are pertinent to duties/activities and ability to operate in an environmentally sound manner.
6. Modify instructions, SOPs, checklists, and training as appropriate to reflect new requirements.
7. Communicate environmental concerns and issues to Environmental Affairs Branch staff.

SECTION 3 - EMS PROCEDURES (EMSP)

The following EMSPs guide the maintenance and operation of MCB Camp Butler EMS elements. Each procedure contains a statement of purpose and applicability, a discussion of the EMS element, and references to related Marine Corps and MCB Camp Butler environmental/safety documents. EMSPs are subject to revision with changes to MCB Camp Butler's mission and environmental requirements or with improvements to the EMS. EMSPs are thus subject to document control procedures provided in EMSP-09, Control of Documents.

EMSPs include:

EMSP NUMBER	EMS ELEMENT	EMS COMPONENT
EMSP-01	Environmental Policy	POLICY
EMSP-02	Practices, Aspects, Impacts, and Risk Prioritization	PLANNING
EMSP-03	Legal and Other Environmental Requirements	
EMSP-04	Objectives, Targets, and Actions to Improve Performance	
EMSP-05	Roles, Responsibilities, and Resources	IMPLEMENTATION
EMSP-06	Competence, Training, and Awareness	
EMSP-07	Communication	
EMSP-08	EMS Documentation	
EMSP-09	Control of Documents	
EMSP-10	Operational Control of Practices	
EMSP-11	Emergency Preparedness and Response	
EMSP-12	Monitoring and Measurement	CHECKING AND CORRECTIVE / PREVENTIVE ACTION
EMSP-13	Evaluation of Compliance	
EMSP-14	Problem Solving	
EMSP-15	Control of Records	
EMSP-16	EMS Review	
EMSP-17	Management Review	MANAGEMENT REVIEW

3.1 POLICY

3.1.1 EMSP-01, Environmental Policy

3.1.1.a Purpose and Applicability

MCB Camp Butler will use the MCIPAC Environmental Statement. This EMSP provides for the management and maintenance of the MCIPAC Commander's Environmental Policy Statement.

3.1.1.b Definitions

None.

3.1.1.c Procedures

The Environmental Policy Statement is signed by the MCIPAC Commanding General and commits MCIPAC, at a minimum, to:

- Compliance with applicable environmental legislation, Final Governing Standards, regulations, and policy;
- Implementing pollution prevention through source reduction and recycling;
- Conserving natural resources and preserving cultural resources;
- Implementing sustainability initiatives
- Minimizing risk to mission;
- Conducting appropriate review of potential environmental impacts of all Federal actions; and
- Continually improving environmental performance through an effective and efficient EMS.

These commitments must be considered in the development and review of objectives and targets.

In accordance with Japan Environmental Governing Standards (JEGS) and the Status of Forces Agreement (SOFA), clean-up of contaminated sites will not be referenced on the MCIPAC Environmental Policy Statement until further guidance on this subject is provided by USFJ.

The MCIPAC Environmental Policy Statement will be made available to the public through MCB Camp Butler's PAO on the MCIPAC and MCB Camp Butler intranet/internet sites. The MCIPAC Environmental Policy Statement will be publicly displayed widely. Camp Environmental staff will provide copies of the MCIPAC Environmental Policy Statement to camp/station personnel. An announcement will be posted in the OkiNews, the mass e-mail service, whenever a new policy is signed.

The MCIPAC Environmental Policy Statement will be reviewed annually during the MCIPAC Commander's Environmental Management Review Board meeting in accordance with MCIPACO 5090.1.

3.1.1.d References and Related EMS Documents

- Japan Environmental Governing Standards (JEGS)
- Status of Forces Agreement (SOFA)
- MCO P5090.2A, Chapter 2: Marine Corps Environmental Management System
- MCIPAC Environmental Policy
- EMSP-07, Communication
- EMSP-17, Management Review

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- MCIPACO 5090.1 EMS

3.2 PLANNING

3.2.1 EMSP-02, Practices, Aspects, Impacts, and Risk Prioritization

3.2.1.a Purpose and Applicability

This EMSP provides instructions on developing, maintaining, and using MCB Camp Butler's inventory of practices and aspects and guides MCB Camp Butler Environmental Affairs Branch personnel and practice owners in analyzing environmental and mission risks associated with the aspect of practices performed aboard the installation.

The practice inventory is critical to the EMS in several ways:

- It comprehensively identifies and documents the installation's practices and aspects that impact the environment.
- It provides the basis for planning and scheduling practice inspections (see EMSP-12, Monitoring and Measurement);
- It enables risk-based ranking of aspects to support decision-making and allocation of resources;
- It enables assignment of environmental responsibilities and accountability to practice owners and other non-environmental staff (see EMSP-05, Roles, Responsibilities and Resources); and
- It facilitates identification, cause analysis, and correction or prevention of compliance and management problems across the installation (see EMSP-14, Problem Solving).

3.2.1.b Definitions

Aspect: A characteristic of a practice that can cause an impact to an environmental or other resource. Each practice may have several aspects.

Impact: An effect of a practice's aspect on an environmental or other resource. Each practice may have several impacts.

Practice: A mission-supporting activity that has the potential to impact the environment.

Practice Owner: This is a broad term that encompasses persons, positions, commands, units, offices, or departments that are responsible for control of practices. The EMSPs use the term “practice owner” where assignment of more specific responsibilities is left to the owning organizations. In some places more specific terms are used including Owning Command (The command aboard the installation that has ultimate responsibility for a practice).

Owning Unit: The lowest organizational unit that operates a practice. Owning commands designate owning units.

Practice Supervisor: The position or individual within an owning unit who has front line supervisory responsibility for the unit's practices.

Practice Operator: Individual who operates a practice.

Risk to Mission: Potential or actual impacts on mission readiness resulting from the occurrence of aspects of practices operated aboard Marine Corps facilities. Mission impacts occur through four risk pathways: environmental impacts, adverse regulatory exposure, adverse public perception, or health and safety impacts. Risk ranking can be used to determine significant aspects of practices and prioritize resources.

WEBCASS Software: A web application to document environmental compliance and EMS conformance deficiencies and manage corrective action plans.

3.2.1.c Procedures

The Environmental Affairs Branch will identify all practices/mission supporting operations within the scope of MCB Camp Butler EMS. This includes an inventory of environmental resources and an assessment of each resource's vulnerability to the aspects of existing and planned practices. Existing practice inventories and organizational charts should be considered in the organization and identification of operations.

Operations or elements thereof, shall be considered an environmental practice if both of the following conditions are met:

- The operation interacts with the environment; and
- The organization can be expected to have control and/or an influence over the operation.

Operations under normal conditions must be assessed for potential environmental impacts. Maintenance and emergency conditions will be assessed or identified as applicable. New operations will be assessed in the planning phase in order to incorporate pollution prevention and management/mitigation actions.

MCB Camp Butler uses Practice-Aspect-Impact (PAI), a Marine Corps EMS web-based tool located in the Web Compliance Assessment and Sustainment System (WEBCASS), to manage the practice inventory and risk prioritization data. PAI supports documentation of MCB Camp Butler's inventory of practices and aspects and related risks to mission, safety and the environment. MCB Camp Butler will not identify impacts, unit names or locations in WEBCASS PAI.

Camp/Station Environmental Coordinators will notify the MCB Camp Butler EMS Coordinator when there are changes in any of the practices. A change in practice could include new equipment, new processes, or changes in facility design. The EMS Coordinator will update PAI accordingly.

Risk prioritization is an analysis of the severity and frequency of impacts to environmental or other resources. Risk prioritization of practices and their aspects builds on data elements maintained in the practice inventory.

The significance of environmental aspects is based on quantitative risk, frequency, and mission impact. Where existing risk process information is available, that data may be integrated into the risk analysis process. Electronic data concerning the risk assigned to specific aspects is contained in PAI.

The EMS Manager will ensure risk scores are reviewed and updated annually. Actions that can trigger a reassessment include completion of ECEs, significant changes in operations, new operations, and modification or new/applicable legal or other requirements.

Total Risk Score

A numerical summation system is used to evaluate environmental aspects to help identify significant impacts. There are four categories that comprise the total risk score:

- Quantitative Risk
- Frequency
- Adjustment Factor
- Risk to Mission Impact

The four quantitative risk factors are:

- Environmental
- Regulatory

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- Public Perception
- Health/Safety

Each factor allows risk to be scored on a scale of 1 to 10. The matrix for determining the quantitative risk scores for each factor are shown below.

Quantitative Risk

<p>Environmental, regulatory, public perception, and health and safety risks must be identified <u>for each aspect</u> by selecting the phrase from the appropriate column that best answers the following question:</p> <p>If this aspect were to occur, what is the degree of (environmental/regulatory/public perception/health and safety) risk that it would pose?</p>				
Score	Degree of Risk by Category			
	Environmental	Regulatory	Public Perception	Health & Safety
10	Major ecological disaster, no recovery likely, extensive loss of wildlife and habitats	Utter negligence, shut-down operation	Permanent damage to organizational reputation, political intervention required	Potential mass casualty, Low probability survival
9	Major or systemic impact to ecology, destruction of national natural/cultural resource	Criminal activity, no environmental oversight	Scandal, criminal activity	Potential casualty, critical injury
8	Extensive remediation requirements, significant degradation of national natural/cultural resource	Heavy fines, significant remediation requirements, missing essential programmatic elements	Public outrage, high visibility negligence	Severe injury, dismemberment, paralysis, blindness, Class A carcinogen
7	Significant impact to local ecology, endangered species threatened, death of wildlife	Moderate fines, minor remediation requirements, major environmental program shortfalls	High visibility programmatic failure, lawsuits	Permanent moderate adverse effect, Class B carcinogen
6	Definite impact to plants and wildlife, potential lasting environmental damage	High compliance risk, aggressive regulator, probable NOV, potential for fines	Public outcry, sense of injustice, discriminatory practice	Permanent minor adverse effect, sight impairment (temporary)
5	Moderate impact to ecology, wildlife threatened	Likely NOV, significant program shortfalls	Serious community concern, public demonstration, sense of unfairness	Moderate injury (temporary), sickness, lost work days
4	Possible impact to plants and wildlife, minor degradation to natural/cultural resource	Medium compliance risk, NON, programmatic shortfalls	Negative news article, public disapproval	Temporary moderate effects, hearing impairment (temporary)

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3	Adverse plant life impact, irritant to wildlife	Mild compliance risk, likely warning from regulators	Minor public disapproval, irritation of special interests	Low-level temporary effects, pain
2	Minimal impact to environment or cultural resources	Low compliance risk, administrative, easy programmatic corrections	Possible irritation to sensitive individuals	Minor injury, temporary discomfort
1	Earth friendly, no impact	No applicable regulation or order	No negative public effect, business as normal	No health threat, effect easily mitigated

Note: When conducting the risk prioritization of aspects, the natural/cultural resources personnel of the Environmental Affairs Branch will meet and assess the vulnerability of natural/cultural resources to the aspects of existing and planned practices. Through their assessment, the natural resources personnel will assign a minimum score to the environmental risk.

When possible, especially for higher-ranking environmental risks, key natural/cultural resources impacted will also be identified (e.g., training lands, drinking water sources including groundwater and surface water bodies, indoor and outdoor air quality, threatened and endangered species, wetlands and other sensitive ecosystems, cultural and archaeological sites etc.).

Note: Notices of Violation (NOV) are not issued to overseas installations; however, noncompliance with the JEGS would be reported to MCICOM through WEBCASS as though an NOV were being issued. Depending on the circumstances, non-compliance with the JEGS would be reported as a (5) NOV, likely significant programs shortfalls.

Frequency

Likelihood of occurrence must be identified <u>for each aspect</u> by selecting the word from the “Likelihood” column that best answers the following question: How likely is it that this aspect will occur, given existing engineering controls, training, SOPs, and other precautions used with the associated practice?	
Score	Likelihood
10	Inevitable
9	Highly probable
8	Probable
7	Likely
6	Possible
5	Fairly unlikely
4	Unlikely
3	Remote possibility
2	Extremely unlikely

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1	Nearly impossible
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Adjustment Factor

-5
0
5

Risk to Mission

Risk to mission is determined based on the effect to mission capability.

The degree of mission impact must be identified <u>for each practice</u> , by selecting the word from the “Mission Impact” column that best completes the following statement: If this practice were to be interrupted, it would have a _____ impact on installation operations and mission.	
Score	Mission Impact
10	Catastrophic
9	Severe
8	Heavy
7	Major
6	Serious
5	Moderate
4	Minor
3	Mild
2	Insignificant
1	Negligible

The risk prioritization of aspects based on the total risk scores will be reflected when setting MCB Camp Butler’s objectives and targets.

Aspect ranking is subject to change as the practices and environmental performance change. Practice inventory data and risk scores are documented in PAI.

The EMS Coordinator conducts a draft ranking for all new aspects using EMSP 02.1 Risk Ranking spreadsheet. The EMSP 02.1 Risk Ranking draft is then staffed to the Installation Safety Office to review

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the Health and Safety Risk and the Natural Resources Team to review the Environmental Risk. After Health and Safety Risk and Environmental Risk have been reviewed, the EMSP 02.1 Risk Ranking draft is staffed to the environmental staff for review. After the environmental staff has completed their review, the EMSP 02.1 Risk Ranking draft is staffed to the EMS Core Team for review and final concurrence.

3.2.1.d References and Related EMS Documents

- MCO P5090.2A, Chapter 2: Marine Corps Environmental Management System
- Practice, Aspect, Impact Inventory in PAI
- EMSP 02.1 Risk Ranking
- EMSP-04, Objectives, Targets, and Actions to Improve Performance
- EMSP-05, Roles, Responsibilities and Resources
- EMSP-13, Evaluation of Compliance
- EMSP-14, Problem Solving
- EM Portal Managers Quick Guide PAI Training Module-Environmental

3.2.2 EMSP-03, Legal and Other Environmental Requirements

3.2.2.a Purpose and Applicability

This EMSP guides MCB Camp Butler Environmental Affairs Branch personnel and practice owners, including DoD tenants and contractors, in remaining knowledgeable of executive, Federal, local, DoD and Marine Corps environmental requirements that may affect MCB Camp Butler practices and environmental/safety programs. At a minimum, all personnel operating aboard MCB Camp Butler and MCAS Futenma must understand and comply with environmental requirements applicable to their duties. Since environmental requirements frequently change, this procedure addresses tracking both emerging requirements and changes to existing requirements.

3.2.2.b Definitions

Requirement. Legislation, regulation, or policy issued by any Executive, Federal, state, local, DOD, Department of Navy, or Marine Corps authority that addresses environmental considerations and requires action by Marine Corps personnel.

3.2.2.c Procedure

The SOFA, JEGS and agency policy provide guidance for environmental compliance and standards for DoD activities on United States facilities and areas in Japan. Generally, U.S. statutes and their enforcing regulations do not apply overseas. However, they are useful for providing background information and insight into DoD policy when the JEGS are not adequate. EMSP 03.1 Legal and Other Requirements is used to document all applicable requirements. This document is reviewed and updated annually by the environmental staff.

To operate in an environmentally sound manner, practice owners, including DoD tenants and contractors, and their operators, must be aware of applicable legislative, regulatory, and policy requirements. Practice owners should incorporate environmental and policy requirements applicable to their practices into their unit/activity instructions and SOPs so that the information is readily available when needed. EMSP-07, Communication, and EMSP-10, Operational Control of Practices, address this.

The Environmental Affairs Branch will inspect and test practices periodically to ensure that they are compliant. Requirements applicable to individual practices are documented in the form of checklists, as discussed in EMSP-13, Evaluation of Compliance and EMSP-10, Operational Control of Practices.

The Environmental Affairs Branch and PACO staff utilizes several additional sources of information on new and emerging guidance requirements, such as:

- Communication with environmental peers and peer groups;
- Communication by letter or email with USFJ;
- Attendance at environmental conferences and seminars;
- Regulatory review periodicals (paper and electronic media);
- Communication from senior Environmental Affairs Branch staff during staff meetings or via e-mail;
- US Environmental Protection Agency (EPA) guidance/direction; and
- Defense Environmental Network and Information Exchange web site: <https://www.denix.osd.mil>

3.2.2. d References and Related EMS Documents

- Executive Orders

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- MCO P5090.2A, Chapter 2: Marine Corps Environmental Management System
- JEGS
- SOFA
- US EPA Federal Register notices
- EMSP 03.1 Legal and Other Requirements
- EMSP-07, Communication
- EMSP-09, Control of Documents
- EMSP-10, Operational Control of Practices
- EMSP-13, Evaluation of Compliance

3.2.3 EMSP-04, Objectives, Targets and Actions to Improve Performance

3.2.3.a Purpose and Applicability

This EMSP identifies the process by which MCB Camp Butler establishes environmental objectives and identifies the process by which MCB Camp Butler achieves objectives and targets.

3.2.3.b Definitions

Objective: A statement that defines an end-state supporting the MCIPAC Environmental Policy Statement. Objectives must be achievable and measurable, and should be quantifiable when practicable.

Target: A detailed performance requirement that sets a limit, usually a quantity and/or a time frame, for the achievement of objectives. An objective may have more than one target.

Environmental Action Plan: Is a document that lists the action items that must be taken in order to achieve a specific target. The Environmental Action Plan has three major elements (1) Specific actionable and measurable tasks: what will be done, (2) Time horizon and accountability: when will it be done and by whom, and (3) Resource Allocation: what specific funds and resources are available for specific tasks.

3.2.3.c Procedures

Environmental Objectives and Targets

Environmental objectives and targets shall reinforce the following guidance:

- Full implementation of the EMS through the identification of appropriate EMS procedures;
- Emphasis is on prevention or mitigation of high-risk or significant aspects of facility operations; and
- Reinforcement of traditional government programs associated with compliance, pollution prevention, natural and cultural resource management, Executive Orders, and environmental performance metrics established by government departments.

Environmental objectives and targets will be:

- reflective of risks to mission determined through prioritization of aspects and practices;
- consistent with and supportive of the MCIPAC Environmental Policy statement and environmental requirements;
- measurable;
- achievable within economic and technological restraints; and
- reviewed and revised at least annually

New objectives and targets will be established by the Core Team and presented at the CEMRB meeting. When an objective and target has not been met or cannot be achieved in the specified timetable, the objective must be updated to reflect the changes in conditions. The CEMRB may update and establish additional objectives and targets during its meeting.

Management Reviews should consider the following:

- Means by which objectives and targets are being accomplished, and
- The continued applicability of the objective and target in light of changes or modifications to the EMS or mission priorities.

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MCB Camp Butler's current environmental objectives and targets are listed in EMSP 04.1 Objectives and Targets and can be found on the Environmental Affairs Branch SharePoint site (<https://wss.mcbbutler.nmci.usmc.mil/FE/ENV/default.aspx>).

Action to Improve Performance

An Environmental Action Plan (EAP) will be developed for each environmental objective and target identified. Each EAP must be documented and specify the following information:

- Person(s) responsible for achieving objective and target;
- Actions by which the objective and target are achieved;
- Funding, and resource requirements
- Effective date/timetable by which actions are to be achieved; and
- Means to monitor and assess current status of objective and target.

Current government planning, programming, and budgeting systems will be utilized to fulfill objectives and implement formal projects. The submission of a project for funding or other support will be identified as an action item in the program. Program timetables should align with the facility funding cycle.

Consideration for bringing additional resources for EAP execution to achieve the environmental objective and target should be discussed during management review. EAPs will be briefed during the management review process described in EMSP-17, Management Review.

3.2.3.d References and Related EMS Documents

- MCO P5090.2A, Chapter 2: Marine Corps Environmental Management System
- MCIPAC Environmental Policy Statement
- EMSP 04.1 Objectives and Targets
- EMSP 04.1.1 Environmental Action Plans (EAP)
- EMSP-02, Practices, Aspects, Impacts, and Risk Prioritization
- EMSP-12, Monitoring and Measurement
- EMSP-13, Evaluation of Compliance
- EMSP-14, Problem Solving
- EMSP-17, Management Review

3.3 IMPLEMENTATION

3.3.1 EMSP-05, Roles, Responsibilities and Resources

3.3.1.a Purpose and Applicability

This EMSP describes MCB Camp Butler organizational and personnel assignments for EMS implementation, environmental program management, practice controls and objectives and targets. This EMSP also guides the EMS Manager and Environmental Affairs Branch staff in identifying funding sources for environmental projects, planning annual budgets, preparing funding requests, receiving and executing funds, and tracking funds.

3.3.1.b Definitions

Practice Owner: This is a broad term that encompasses persons, positions, commands, units, offices, or departments that are responsible for control of practices. The EMSPs use the term “practice owner” where assignment of more specific responsibilities is left to the owning organizations. In some places more specific terms are used including:

- Owing Command – The command aboard the installation that has ultimate responsibility for a practice.
- Owing Unit – The lowest organizational unit that operates a practice. Owing commands designate owning units.
- Practice Supervisor – The position or individual within an owning unit who has front line supervisory responsibility for the unit’s practices.
- Practice Operator – Individual who operates a practice.

Centrally Managed Environmental Program (CMEP): The CMEP account funds both the environmental management and environmental projects programs at the installation level:

- Environmental Management Program—This program provides CMEP funds to installations for either one-time funding for non-recurring requirements.
- Environmental Projects Program—This program provides CMEP funds to installations for major repair and minor construction environmental projects.

Status Tool for the Environmental Program (STEP): This web-based environmental project and budget management application allows the Marine Corps installations to monitor and track the progress of environmental projects.

Local Operational Budget (OPBUD): The installation’s operating budget that covers routine and recurring costs.

Operational Plan Submission (OPS): A report submitted annually to CMC (LF) by each installation requesting CMEP Environmental Management Program funding.

Operation and Maintenance, Marine Corps (O&MMC) Funds: O&MMC is the primary source of environmental funds for active installations. It includes both CMEP and OPBUD accounts.

Programming, Planning and Budgeting System (PPBS): The process through which all Marine Corps resource requirements, including the environmental program, are identified, justified, and funded.

Program Objective Memorandum (POM): Biennial submission to CMC reporting program objectives and costs. POM data is used to develop the Five Year Defense Plan.

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Standard Accounting and Budgeting Reporting System (SABRS): SABRS is the official accounting system for the Marine Corps.

3.3.1.c Procedures

Responsibilities for environmental/safety performance can be categorized as follows:

- Implementation and sustainment of all elements of the EMS;
- Management of environmental programs; and
- Management of the aspects and impacts.

EMS Implementation and Maintenance

The primary responsibility for implementation and maintenance of the EMS has been assigned to the Assistant Chief of Staff, G-F as the EMS Director. EMS Director responsibilities include:

- Ensuring maintenance of the EMS Manual and procedures;
- Ensuring EMS requirements are established, implemented and maintained in accordance with the EMS Manual; and
- Reporting on the performance of the EMS to the CEMRB.

The EMS Director has assigned primary responsibility for controlling, releasing and updating key EMS supporting documentation to the EMS Manager.

The EMS Manager will designate an EMS Coordinator. The EMS Coordinator provides technical and management support to the EMS Core Team. Results of these meetings will be documented, distributed, and posted on the Environmental SharePoint site at <https://wss.mcbbutler.nmci.usmc.mil/FE/ENV/default.aspx>

Responsibilities for the EMS coordinator are summarized in section 2.6 of this manual. Membership and requirements of the MCB Camp Butler Core Team are outlined in EMSP- 17, Management Review.

EMS audits are conducted annually to evaluate, declare and report MCB Camp Butler's conformance with each of the Marine Corps EMS elements.

Environmental Management Programs (EMPs)

MCB Camp Butler environmental programs are managed to ensure compliance with JEGS requirements and MCIPAC Environmental Policy. The responsibility to manage these programs is summarized below.

Environmental Affairs Branch	Installation Safety Office	United States Naval Hospital Okinawa	Kadena Air Base
Air Emissions	Asbestos	Medical Waste	All EMPs for Air Force tenants aboard MCB Camp Butler
Drinking Water	Hazardous Material (HM)	All EMPs for the Naval Hospital	

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Environmental Affairs Branch	Installation Safety Office	United States Naval Hospital Okinawa	Kadena Air Base
Wastewater	Lead Based Paint (LBP)		
Hazardous Waste (HW)	Low-Level Radioactive Material		
Solid Waste (SW)			
Petroleum, Oil and Lubricants and Above Ground Storage Tanks			
Noise			
Pesticides			
Historic and Cultural Resources			
Natural Resources			
Polychlorinated Biphenyls (PCB)			
Radon			
Underground Storage Tanks			
Pollution Prevention (P2)			
Spill Prevention & Response			

MCO P5090.2A provides detailed requirements for ensuring compliance and improving environmental performance of specific environmental programs.

The EMP plans and instructions maintained by the Environmental Affairs Branch are contained in EMP 01.2, Environmental Compliance and Protection Standard Operating Procedures (ECPSOP). The ECPSOP is organized into two sections. Section 1 provides an overview of the ECPSOP. Section 2 describes each environmental program in the following format:

- Description

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- Overview
- Responsibilities
- Training Requirements
- Database Management
- Sampling, Monitoring, Measuring and Reporting Requirements
- Pertinent Documents

Environmental Affairs Branch personnel are responsible for managing their assigned MCB Camp Butler environmental programs. In addition to the ECPSOP, environmental program management responsibilities are documented in the position descriptions and in turnover folders for each billet. Position descriptions specify the program management responsibilities and other duties for personnel management purposes. Turnover folders provide details about how those responsibilities are to be carried out and how duties are to be accomplished in order to facilitate their transfer to replacement personnel when needed.

Management of Change

When there are facilities, equipment or process changes, the EMS must be updated. Changes may also have their origins in administrative functions that may affect environmental impacts. Examples of these changes include:

- System modifications due to continual improvement programs;
- Findings from audits resulting in corrective and preventive actions;
- Management review resulting in modifications to system elements; and
- Changes initiated by senior leadership (e.g., modification of existing MCIPAC Environmental Policy, change in command, or publication of new policies or directives).

The practice owners will contact the Camp Environmental Coordinator when changes occur. The Camp Environmental Coordinator will review practices on an annual basis.

Practice Control

Practice owners are responsible for managing processes to prevent adverse impacts on the environment in the accomplishment of their missions. Owning commands are responsible for incorporating requirements and best management practices into instructions, SOPs (see EMSP-10, Operational Control of Practices), training (see EMSP-06, Competence, Training and Awareness), and for taking actions to manage practices.

The EMS Director will review structure and responsibilities annually for its effectiveness in meeting EMS commitments.

Funding

MCB Camp Butler Environmental Affairs Branch personnel identify needed environmental projects through a variety of means, including, but not limited to:

- Projects planned to achieve environmental objectives and targets (see EMSP-04, Objectives, Targets, and Actions to Improve Performance);
- Sampling, monitoring and measuring activities (see EMSP-12, Monitoring and Measurement), including environmental self-audit, sampling and analysis, natural/cultural resource monitoring, and EMS and regulatory compliance audits results;

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- Non-conformance, corrective and preventive actions and corrective action development (see EMSP-14, Problem Solving);
- MCICOM ECE (see EMSP-13, Evaluation of Compliance) and resulting Plan of Action & Milestones (POA&Ms); and
- Senior management review of the EMS (see EMSP-17, Management Review).

Environmental projects typically require external funding. MCO P5090.2A establishes Marine Corps policy and responsibilities for compliance with Marine Corps procedures for funding environmental compliance. MCB Camp Butler uses a variety of funds to meet environmental requirements, including:

- Military Construction (MILCON);
- O&MMC, including OPBUD and CMEP;
- Procurement, Equipment (> \$100K each); and
- Unfunded Reimbursable Accounts, including Qualified Recycling Program revenues.

Installation environmental requirements are identified through the PPBS and STEP. CMC (G-F) tracks and reports these requirements up the chain to the DoN, DoD, and Congress. MCB Camp Butler is required to implement and use STEP and SABRS to monitor and track funding for environmental requirements.

Most environmental requirements are funded with O&MMC OPBUD or CMEP accounts and are appropriated for one year. Due to the unique flow structure at each installation, environmental OPBUD funds risk losing visibility once released from MCICOM G-F. Therefore, when MCB Camp Butler executes funds, every effort will be made to monitor and track these funds appropriately using SABRS environmental accounting codes. These codes must also be used in STEP to support the MCICOM (G-F) program sponsor and MCB Camp Butler environmental managers with POM, budget requirements and requests for CMEP funding for emergent requirements. Funding status must be kept current to assist MCICOM (G-F) with short notice reporting requirements (e.g. Congressional Inquiries) and to reduce data calls to MCB Camp Butler.

The Environmental Affairs Branch formulates the POM and budget reports using STEP. Budget requests for environmental projects include the results of the economic analysis and certification that the installation considered and assessed pollution prevention alternatives. The MCICOM (G-F) environmental program manager uses STEP to validate requirements in the POM and to report and defend the MCB Camp Butler environmental budget.

The MCB Camp Butler POM report contains environmental program objectives and costs for the six years following the biennial submission. The MCICOM (G-F) environmental program sponsor will provide official guidance through MCICOM (RFO) to assist installation environmental managers in preparing these reports, and will distribute this guidance to installation fiscal offices.

The Funds Budgeted for Environmental Quality Report and the Environmental Quality Report are budget reports compiled from STEP data and are categorized by appropriation (e.g. MILCON, O&MMC). MCICOM (G-F) will submit the contents of the report as the Marine Corps environmental budget via the Office of the Secretary of the Navy and the Office of the Secretary of Defense to the President's Budget.

MCB Camp Butler uses STEP to request CMEP funding. The official procedure for requesting CMEP funding is outlined in MCO P11000.5. STEP project notes section will be used to identify

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whether funding is needed to achieve objectives and targets or for corrective/preventive measures.

Manpower

The MCB Camp Butler Environmental Officer will periodically evaluate manpower dedicated to environmental management and realign roles and responsibilities as needed to support MCB Camp Butler environmental objectives and targets, as well as improvements planned for EMS elements.

3.3.1.d References and Related EMS Documents

- MCO P5090.2A, Chapter 2: Marine Corps Environmental Management System
- MCO P11000.5
- MCO P11000.12
- MCO P7300.21
- EMSP-05, Objectives, Targets, and Actions to Improve Performance
- EMSP-09, Control of Documents
- EMSP-10, Operational Control of Practices
- EMSP-13, Evaluation of Compliance
- EMSP-14, Problem Solving
- EMSP-17, Management Review
- EMP 01.2 ECPSOP
- Position Descriptions for Environmental Affairs Branch staff
- Turnover Folders for Environmental Affairs Branch staff
- Defense Planning Guidance
- Commandant's Planning Guidance
- STEP User Guide
- SABRS User Manual
- Program Data Requirements (formally known as POM Preparation Instructions)
- Environmental Project Planning Guide

3.3.2 EMSP-06, Competence, Training and Awareness

3.3.2.a Purpose and Applicability

This EMSP establishes the process by which environmental and EMS training needs are identified, training is conducted and competency is assessed.

3.3.2.b Definitions

None.

3.3.2.c Procedures

The Comprehensive Environmental Training and Education Program (CETEP) Coordinator is responsible for conducting training needs assessments to determine the following:

- Identification of personnel who can potentially impact the environment through job assignments and responsibilities; and
- Appropriate competencies to perform job assignments and responsibilities.

Training must provide personnel with the necessary skills and knowledge to perform their work in an environmentally sound manner. The following list of significant environmental training requirements are grouped under the three major CETEP components as specified in the MCB Butler CETEP Plan:

- Environmental General Awareness Component.
- Job-Specific Required and Necessary Training Component. This training is specific to job function/duties and is designed to meet specialized needs.

Training will be documented and training records will be maintained. Training requirements will be reviewed on an annual basis and updated as necessary.

Contractors and vendors involved in all new and current contracts that may have a significant impact on the environment receive training and information from the Contractor/Vendor EMS and Environmental General Awareness Training Guide for Marine Corps installations on Okinawa

3.3.2.d References and Related EMS Documents

- MCO P5090.2A, Chapter 2: Marine Corps Environmental Management System
- EMSP-03, Legal and Other Environmental Requirements
- EMSP-07, Communication
- EMSP-10, Operational Control of Practices
- EMSP-12, Monitoring and Measurement
- MCB Butler CETEP Plan
- Contractor/Vendor EMS and Environmental General Awareness Training Guide

3.3.3 EMSP-07, Communication

3.3.3.a Purpose and Applicability

This EMSP guides MCB Camp Butler and tenant personnel in the communication of environmental information both within the installation (internal communication) and with interested external parties (external communication).

3.3.3.b Definitions

Internal Communication: Communication of environmental information between personnel operating on MCB Camp Butler and MCAS Futenma. Internal communication includes vertical communication (up through lines of authority) and horizontal communication (between commands/units/activities). Examples of internal communication include:

- Communication among Environmental Affairs Branch staff;
- Communication between the Environmental Affairs Branch staff and practice owners;
- Communication between the Environmental Officer and managers of other MCB Camp Butler departments, tenants, and contractors;
- Communication between practice owners and their chains of command;
- Communication between the Environmental Officer and the Installation and Camp Commanders, the EMS Core Team, the EMS Coordinator and Camp Environmental Coordinators; and
- Communication between MCB Camp Butler Environmental Affairs Branch staff and Environmental Staff from other MCIPAC installations.

External Communication: Communication of environmental information between MCB Camp Butler personnel and external (non-MCB Camp Butler) persons or groups. Examples of external communication include:

- Communication with MCICOM;
- Communication with DoD or component services (including other Marine Corps installations outside of MCIPAC);
- Communication with the public; and
- Communication with local government agencies.

3.3.3.c Procedure

Internal Communications

The EMS Manager is designated as the primary EMS point-of-contact for the organization. To establish and maintain awareness of the EMS, the EMS Manager may use a variety of methods, including:

- Bulletins
- Handouts
- Meetings
- Intranet/internet
- Classes and briefs

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- Radio/TV/Newspaper

The EMS Manager will establish a communications structure to receive and respond to comments, inquiries, and suggestions on environmental matters, including:

- Environmental and EMS related questions;
- Environmental compliance concerns;
- Environmental program management roles and responsibilities; and
- Pollution prevention.

Environmental staff will communicate with legal staff early as part of the process.

To communicate EMS issues and changes resulting from management review or other actions, the EMS Manager will ensure the following:

- System changes are routed to appropriate personnel who can implement system updates;
- Supervisors communicate EMS information to relevant personnel; and
- Contractors and suppliers, while on-site, are made aware of the MCIPAC Environmental Policy and the environmental impacts of their services.

Emergency communications associated with emergency conditions will be in accordance with EMSP-11, Emergency Preparedness and Response.

External Communications

The MCB Camp Butler PAO is designated as the point-of-contact for communication with the local media. The MCIPAC Environmental Policy Statement will be made available to the public through the PAO on the MCB Camp Butler and MCIPAC web page via the intranet/internet. The MCIPAC Environmental Policy Statement is available to anyone upon request.

The MCB Camp Butler G-7 is designated as the point-of-contact for communications with local government agencies/activities, inclusive of regulatory agency communications. G-7 will staff requests for information to the environmental/safety personnel responsible for the issue and to legal counsel.

The Staff Judge Advocate (SJA), Marine Corps Base, Camp S. D. Butler is designated as the point-of-contact for communications through the Freedom Of Information Act (FOIA). Environmental information is available to the public upon request, subject to the confidentiality of the information concerned. The SJA and the Pacific Area Council Office will redact information as appropriate prior to submitting a document to USFJ J1 for release to the public.

If the installation receives a request for ECE Program records, counsel and MCICOM (G-F) will be consulted before releasing the records in accordance with MCO P5090.2A.

The Environmental Affairs Branch will deal directly with environmental information requests from DoD, MCICOM, other component services and other Marine Corps installations.

MCB Butler will comply with the USFJ Environmental Engagement Strategy. This document was published to provide direction and guidance to U.S Forces in Japan as well as to educate and to influence the attitudes of the Japanese regarding U.S. environmental policies, practices and procedures. The objective of this document is to unify environmental information management effort as well as deliver appropriate messages that demonstrate U.S.' efforts to protect the environment.

3.3.3.d References and Related EMS Documents

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- MCO P5090.2A, Chapter 2: Marine Corps Environmental Management System
- EMSP-09, Control of Documents
- EMSP-11, Emergency Preparedness and Response
- USFJ Environmental Engagement Strategy

3.3.4 EMSP-08, EMS Documentation

3.3.4.a Purpose and Applicability

This EMSP guides the EMS Core Team and the EMS Coordinator in the annual review and revision of the EMS Manual in order to ensure it supports the missions of units and activities aboard MCB Camp Butler and the goals of the MCIPAC Environmental Policy Statement.

3.3.4.b Definitions

EMS. A systematic approach for integrating environmental considerations and accountability into day-to-day decision-making and long-term planning processes across all missions, activities, and functions. The EMS institutionalizes processes for continual environmental improvement and reducing risks to mission through ongoing planning, review, and preventive or corrective action.

3.3.4.c Procedures

An annual review of the EMS (see EMSP-16, EMS Review) and results of compliance evaluations and non-conformance, corrective and preventive actions (see EMSP-13, Evaluation of Compliance, and EMSP-14, Problem Solving) will indicate needed improvements to the EMS. In addition, anyone participating in MCB Camp Butler's EMS may suggest improvements to the EMS and the EMS Manual.

The EMS Coordinator receives and records suggestions for improvement, ensures that the EMS Core Team is aware of the suggestions, effects approved changes, and maintains document control of the EMS Manual on behalf of the EMS Core Team. The EMS Director is ultimately responsible for ensuring revision of the EMS Manual consistent with improvements to the EMS.

3.3.4.d References and Related EMS Documents

- MCO P5090.2A, Chapter 2: Marine Corps Environmental Management System
- MCIPAC Environmental Policy Statement
- EMS-1 Environmental Management System Manual
- EMSP-04, Objectives, Targets, and Actions to Improve Performance
- EMSP-12, Monitoring and Measurement
- EMSP-14, Problem Solving
- EMSP-16, EMS Review

3.3.5 EMSP-09, Control of Documents

3.3.5.a Purpose and Applicability

This EMSP guides MCB Camp Butler personnel in controlling EMS documents.

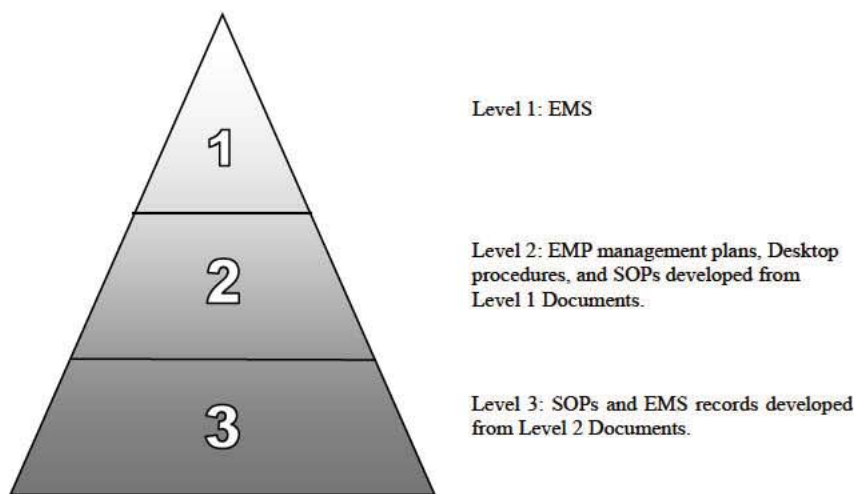
3.3.5.b Definitions

Environmental Documents: Documents that contain instructions or information regarding operation of the EMS, management of environmental programs, and control of practices. Examples of environmental documents include the EMS Manual and the EMPs.

3.3.5.c. Procedures

EMS Document Structure

The primary EMS documentation structure is divided into three sections that are described as Levels 1, 2 and 3. The EMS Document structure is:



Level 1 contains the MCIPAC Environmental Policy Statement and MCB Camp Butler EMS Manual. These documents describe the EMS system's core elements and how system elements relate to each other.

Level 2 contains environmental management plans, SOPs, desktop procedures and supporting documents developed from the procedures and key elements identified in Level 1.

Level 3 contains SOPs and records as a result of testing. Any EMS related supporting documents and records from the procedures and key elements identified in Level 2 are also contained in Level 3.

Document Control

Documents must be managed to ensure:

- They can be located;
- Appropriate document numbering system is used in order to track associated documents and records;
- They are protected from alterations or damage (records);
- They are reviewed and updated as necessary.

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- They are available when and where needed in their current versions.;
- Older versions are removed from circulation and destroyed or archived as appropriate..

The Environmental Affairs Branch maintains a virtual library on the MCB Camp Butler environmental server and the Environmental Affairs Branch SharePoint site for access by MCB Camp Butler employees. Additionally, documents will be uploaded to the Marine Corps Installations Command (MCICOM) Environmental Management (EM) Portal. Document modifications are restricted to authorized personnel to ensure accuracy. EMS documents and specific environmental requirements such as laws, regulations, policies, and other types of guidance are located on the environmental server and SharePoint. The Environmental Affairs Branch tracks document archival status, review status, identifies points of contact, document expiration date, reviewing organizations, document distribution list, and document location. Personnel should refer to the Environmental Affairs Branch SharePoint site for the latest EMS guidance.

Maintenance of Document Inventory

MCB Camp Butler has developed numerous environmental plans and procedures as required by regulations and Marine Corps policy. Additional documents are developed and controlled to maintain the EMS.

The Environmental Affairs Branch maintains a current inventory of environmental documents. The inventory includes information on the document owner authorized to modify each document, the status of each document, current version number and date, and information on its revision or renewal cycle. Copies of environmental documents are maintained at the Environmental office and at other locations listed in the document inventory. The EMS Coordinator ensures that the document inventory is updated as required. The Environmental Affairs Branch document inventory is contained in EMSP 09.1 Document Inventory Log.

Document Control System

EMS Document Numbering Scheme

- (1) The EMS Assistant will be responsible for assigning document numbers. Environmental personnel will coordinate with the EMS Assistant for assignment of document control numbers. In the absence of the EMS Assistant, the EMS Coordinator will assign document numbers.
- (2) The first part of the document number scheme will identify if documents were developed to support EMS Elements or Environmental Programs:
 - Environmental Management System Procedure (EMSP) – will be designated for procedures and SOPs that support one of the seventeen elements of EMS (e.g., Practices, Aspects, Impacts, and Risk Prioritization, etc.). Exception to this rule is the MCIPAC Environmental Policy and EMS Manual, the first part of their document numbering will be designated as “EMS” (e.g. EMS-01.6 for MCIPAC Policy and EMS-1 for EMS Manual.)
 - Environmental Management Program (EMP) – will be designated for procedures and SOPs that support specific environmental programs (e.g. Air, Water, Natural Resources, etc.).
- (3) The second part of the document number scheme is an assigned numerical character that will identify the desktop procedures or SOPs for a specific procedure or program that it supports:
 - EMSP XX – the number assigned will range from 01 – 17, following the 17 elements of EMS that corresponds to the desktop procedure or SOP.

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- EMP XX – the number assigned will range from 01 – 19, following the 19 chapters of the Japan Environmental Governing Standards (JEGS) that corresponds to the desktop procedure or SOP, 20 for Pollution Prevention, 40 for Energy and 50 for Sustainability related documents.

(4) The third part of the document number scheme will be assigned sequentially (i.e. 1, 2, 3, etc.):

- EMSP 05.XX
- EMP 14.XX

(5) Environmental documents managed by offices outside of the Environmental Affairs Branch (e.g., Installation Safety Office, G-3, etc.) may follow their own document numbering scheme.

Document Review, Approval and Retention

For existing documents, the EMS Assistant sends a review notice to the document owner and EMS Coordinator when periodic review is required or when changes have occurred that need to be documented.

For new and revised documents, the document owner coordinates reviews with other responsible parties as applicable, edits and documents any changes made, and obtains the necessary approval of the document.

The document owner forwards the approved document to the EMS Coordinator, who ensures appropriate review has occurred.

The EMS Assistant posts a copy of the document in the MCB Camp Butler environmental server, the Environmental SharePoint site and EM Portal, archives obsolete electronic versions for historical information, and prints the document for filing in the EMS Library.

The EMS Assistant sends the document to the appropriate distribution list, notifying them of the most current version for use and that any previous version is obsolete and should be discarded.

The following general document control procedures apply:

- Documents subject to revision shall be clearly marked on each page with a version number.
- Environmental documents will be electronically filed, as appropriate, in the following locations:
 - The MCB Camp Butler Environmental server at \\ct7geofifstr03\gis_data1\ENV\EMS_MCBJ
 - The Environmental Affairs Branch SharePoint site at <https://wss.mcbbutler.nmci.usmc.mil/FE/ENV/default.aspx>
 - MCICOM EM Portal at <https://intranet.emportal.usmc.mil/default.aspx>
- Electronic versions of all documents identified in the document inventory are considered to be the current versions.
- Paper documents shall be identified as obsolete and removed and replaced with current versions immediately upon issue of the new version.

Environmental personnel shall ensure that these document control provisions are met.

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Environmental Correspondence. The Environmental Secretary will assign all Environmental correspondence with a serial number following the guidelines of the Navy Correspondence Manual.

EMS Documents at Point of Operational Use. Once notification is received from the EMS Assistant regarding changes to EMS documents, the Camp/Station Environmental Coordinators will notify the Practice Owners of changes in writing. The Practice Owners are responsible for destroying old printed copies.

EMSP 09.1 Document Control Log must be maintained. At a minimum, the following information will be referenced:

- Document identification number
- Document title;
- Person authorized to modify the document;
- Current version;
- Published date;
- Last annual review date;
- Planned Review Date; and
- Hard copy locations.

The log must reflect an up-to-date listing of all active documents contained within the EMS. Documents referenced within the EMS should also be identified to ensure they are maintained.

EMS documents critical to the daily operation of the EMS must be accessible to all personnel who rely on such documents. Uncontrolled hardcopies may be printed when necessary to facilitate daily operations.

Following the revision of an EMS document, all uncontrolled hard copies should be replaced or updated promptly.

Document Review, Approval and Retention

All EMS documents prepared for distribution will contain the appropriate document identification (title and number reference), version number, and the issue date or date of reissue.

The EMS Manager is responsible for document review and an approval process will be established and followed in order to ensure documents are reviewed for adequacy prior to issue.

Procedures and EMS documents will be reviewed annually, at a minimum. Reviews will be documented and, where applicable, the reissue date of the documents identified. Necessary modifications to documents should be made promptly.

Unless otherwise identified by legal requirement or specific retention requirements referenced within EMS procedures, records retention will follow this general guide: EMS-related

records will be retained for at least three years.

3.3.5.d References and Related EMS Documents

- MCO P5090.2A, Chapter 2: Marine Corps Environmental Management System
- EMSP-03, Legal and Other Environmental Requirements
- EMSP-06, Competence, Training and Awareness

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- EMSP-07, Communication
- EMSP-10, Operational Control of Practices
- EMSP 09.1 Document Control Log

3.3.6 EMSP-10, Operational Control of Practices

3.3.6.a Purpose and Applicability

This EMSP guides the development of practice controls and incorporation and maintenance of those controls in instructions, SOPs or other work place documentation. Environmental SOPs reduce the likelihood and/or extent of adverse impact on the environment from MCB Camp Butler and MCAS Futenma activities.

3.3.6.b Definitions

Practice Controls: Controls that reduce the likelihood and/or extent of adverse impacts to the environment. Practice controls achieve one or more of the following purposes:

- Training and awareness (see EMSP-06, Competence, Training and Awareness);
- Operational control (including replacing, changing, or eliminating practices, as well as following prescribed operation instructions); and
- Emergency preparedness and response (see EMSP-11, Emergency Preparedness and Response).

Some of the practice controls that achieve these purposes are required by regulation or policy. Many more are not “required”, but are judged by an installation to be necessary to comply with the MCIPAC Environmental Policy or to otherwise minimize risks to mission.

Standard Operating Procedure (SOP): A written procedure that instructs practice owners in the environmentally sound operation of practices. SOPs should be integrated into existing technical procedures or Manuals for operation of practices, when feasible, but may need to be distributed or posted in the work place as separate documents.

3.3.6.c Procedures

In order to provide practice owners with relevant controls, where and when needed, in language that will be understood, and in sufficient detail, Camp Environmental Coordinators and the Environmental Affairs Branch staff will collaborate to identify mandated and other necessary controls, and to translate requirements into controls that can be easily understood and implemented. Practice owners designate responsibilities and frequencies for controls and incorporate the controls, along with associated responsibilities and frequencies, into their command’s/unit’s instructions and/or SOPs. Checklists will be used as needed.

The table below will be used to determine when a separate Environmental SOP needs to be developed.

Practice Control Planning Matrix		
Significant Practices	Is control of significant practice addressed in sufficient detail in one or more of the following?	Need for ESOP

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	Higher Order	ECPSOP	Other Base Order	Signed Base Plan	Does a separate ESOP need to be developed? (Y/N)	Comments
	Specify (e.g. DODI, SECNAV INST, MCO)	Specify Section	Specify Order and Section	Specify (e.g., SPCC, HWMP, INRMP, SPRP)		

3.3.6.d References and Related EMS Documents

- MCO P5090.2A, Chapter 2: Marine Corps Environmental Management System
- EMSP-03, Legal and Other Environmental Requirements
- EMSP-04, Objectives ,Targets, and Actions to Improve Performance
- EMSP-06, Competence, Training and Awareness
- EMSP-07, Communication
- EMSP-09, Control of Documents
- EMSP-11, Emergency Preparedness and Response
- EMSP-12, Monitoring and Measurement

3.3.7 EMSP-11, Emergency Preparedness and Response

3.3.7.a Purpose and Applicability

This EMSP identifies the process for the prevention, identification, preparedness and response to accidents and emergency situations to ensure the environmental impacts associated with an emergency situation are mitigated.

3.3.7.b Definitions

Facility Incident Commander (FIC): The FIC is responsible for the overall management of an incident. The senior fire official responding to an incident is the designated FIC.

3.3.7.c Procedures

Emergency prevention, preparedness and response practices include:

- Measures to prevent or avoid situations, such as pollution prevention efforts, operational controls, process or practice operational or engineering changes, administrative changes and operational controls; and
- Response plans to deal with situations. These plans are necessary should prevention or avoidance measures fail. Plans outline the steps to be taken in the event of an emergency situation. Drills and organization and/or community emergency response support practices must be tested where practicable.

Specific procedures for emergency preparedness and response are contained in EMSP 11.1 Spill Prevention and Response Plan.

EMSP 11.2 Spill Response and Notification Procedures are posted at all locations for where petroleum, oil & lubricants (POLs) and hazardous substances (HS) spills could occur.

EMSP 11.3 Reportable Spill Roster is used by the Environmental Affairs branch to report spills to USFJ and MCB Camp Butler senior staff.

A Site Specific Spill Plan (SSSP) is maintained at each site where significant spills could occur. A significant spill is defined by JEGS. EMSP 11.4 SSSP SOP provides procedures and guidelines for the development of MCB Butler's SSSPs. EMSP11.4.1 SSSP Template is used to develop the SSSPs.

EMSP 11.10 9-1-1 HAZMAT Spill Response Notification Procedures is used by the 911 staff for receiving and communicating calls involving emergencies that require spill response.

New practices identified must be evaluated and, if applicable, must be included in emergency preparedness and response procedures.

Emergency contacts and emergency instructions must be displayed and known throughout the organization. Notification procedures are established in EMSP 11.2 Spill Response and Notification Procedures. These procedures have been translated into Japanese and are required to be displayed at all facilities where a spill is possible.

All drills and testing must be documented and critiqued by senior emergency response personnel in order to identify the need for process and practice improvements due to observed non-conformance or inadequate or partial response to practices. Changes to EMS procedures and operational controls should be considered. Required changes should be made and appropriate training scheduled promptly.

3.3.7.d References and Related EMS Documents

- MCO P5090.2A, Chapter 7: Emergency Planning and Response

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- MCO P5090.2A, Chapter 2: Marine Corps Environmental Management System
- EMSP 11.1 Spill Prevention and Response Plan
- EMSP 11.2 Spill Response and Notification Procedures
- EMSP 11.3 Reportable Spill Roster
- EMSP 11.4 SSSP SOP
- EMSP 11.4.1 SSSP Template
- EMSP 11.10 9-1-1 HAZMAT Spill Response Notification Procedures
- EMSP 10, Operational Control of Practices

3.4 CHECKING AND CORRECTIVE/PREVENTIVE ACTION

3.4.1 EMSP-12, Monitoring and Measurement

3.4.1a Purpose and Applicability

MCB Camp Butler will establish sampling, monitoring and performance measurement plans to track and report environmental performance. All sampling, monitoring and measuring will be carried out in accordance with recognized standards and procedures.

3.4.1b Definitions

None.

3.4.1c Procedure

Sampling

Program Managers are responsible for sampling, monitoring and measuring in accordance with the JEGS and DoD policies. All sampling will be carried out in accordance with recognized standards.

Sampling will be performed when deemed necessary. The necessity of the sample will be based on the following criteria:

- Suspected negative impact on the environment;
- Legislative and regulatory compliance;
- Environmental performance in relation to environmental improvement activities;
- Pollution Prevention assessments;
- Requirements for Hazardous Waste Profile Sheets; and
- Cost-benefit analysis.

Additional areas which may guide sampling requirements include:

- Community sensitivity;
- Employee sensitivity;
- Political sensitivity;
- Local circumstances;
- Insurance liability; and
- Nuisance.

All equipment used in monitoring and measurement of environmental data shall be properly calibrated and/or maintained.

Monitoring and Measurement

Monitoring and measurements for environmental performance must be maintained for government performance metrics. The Department of Defense Strategic Sustainability Performance Plan (SSPP) lays out goals and sustainability performance expectations establishing the path by which DoD will enhance the ability to achieve its mission, lower life cycle costs, and advance technologies and practices that further the sustainability goals of the nation. EMS is the preferred management tool for ensuring that environmental components of sustainability performance objectives and targets are effectively established and met.

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In addition to or in support of the required metrics, monitoring and measurements for environmental performance must be maintained for the following areas:

- Regulatory requirements;
- Scientific studies;
- Environmental performance in relation to objectives, targets and environmental management program action plans; and
- Suspected negative impact on the environment and/or risk assessment confirmation or nuisance.

Monitoring and measurement records should provide the following information:

- Date of measurement;
- Actual measurement captured;
- Certification of results by monitoring personnel;
- Comments on monitoring activity;
- Monitoring equipment used; and
- Associated operational controls.

All analysis should be conducted in a laboratory that has been certified by US and/or Japan regulatory authority for the applicable test method, as stated in JEGS paragraph C1.5.3. The results of monitoring associated with compliance parameters or other data considered critical to protection of the environment must be reviewed in a timely manner and results must be compared against requirements. Any sample outside of established parameters requires an investigation into the root cause and follow-up corrective and preventive actions.

Regulatory Compliance Tracking

Results from environmental compliance audits and corrective actions are tracked and used as performance indicators. Performance indicators associated with corrective actions include status and completion of corrective actions.

Incidents associated with spills and releases are tracked and used as indicators of conformance as referenced in EMSP-11, Emergency Preparedness and Response. Performance indicators associated with spills and MCB Camp Butler actions include the ability to address and resolve compliance measures aimed at prevention, control and abatement.

Environmental Performance Reporting

A hard copy of the Annual EMS Conformance Summary from the United States Marine Corps (USMC) Web Compliance Assessment and Sustainment System (WEBCASS) must be signed by the EMS Lead Auditor and the Assistant Chief of Staff, G-F to certify conformance or non-conformance with the Marine Corps EMS, as appropriate. The Annual EMS Conformance Summary will be submitted to MCICOM as part of the EMS conformance audit report.

3.4.1.d References and Related EMS Documents

- MCO P5090.2A, Chapter 4: Environmental Compliance Evaluation Program
- MCO P5090.2A, Chapter 2: Marine Corps Environmental Management System
- USMC WEBCASS application (online) and audit records including POA&Ms

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- EMSP-09, Control of Documents
- EMSP-13, Evaluation of Compliance
- EMSP-14, Problem Solving
- EMSP-16, EMS Review
- EMSP-17, Management Review
- Department of Defense Strategic Sustainability Performance Plan

3.4.2 EMSP-13, Evaluation of Compliance

3.4.2.a Purpose and Applicability

This EMSP identifies how MCB Camp Butler will evaluate compliance.

3.4.2.b Definitions

None.

3.4.2.c Procedures

ECEs

ECEs are performed to assess compliance with applicable legal and other requirements, as described below. The EMSP 13.1 Desktop Procedures for Environmental Compliance will be followed while conducting the ECE.

All Marine Corps installations, commands and tenant activities are required to participate in the ECE program. There are two types of ECEs. MCICOM-sponsored ECEs which are conducted on a three year cycle, and self-audit ECEs which are conducted annually by the installation during years when there is no MCICOM-sponsored ECE.

ECEs are conducted to assess compliance of all environmental programs. ECEs may be performed by internal staff or by external parties, such as the US Environmental Protection Agency (EPA). All external evaluators will be independent of the organization/unit/activity being evaluated. Evaluators must be familiar with pertinent technical issues and applicable regulations concerning the environmental program assigned and the WEBCASS program.

WEBCASS

WEBCASS is the online tool Marine Corps installations use for tracking compliance and EMS conformance. MCB Camp Butler is required to maintain and use WEBCASS to track both MCICOM sponsored ECEs and the installation's self-ECE program. Checklists for will be produced using REGSCAN.

Reporting

Reports on the results of the ECE will be produced using the WEBCASS program. WEBCASS will generate the POA&M report. The EMS Director is responsible for presenting the ECE results to the Commander during the CEMRB.

3.4.2.d References and Related EMS Documents

- MCO P5090.2A, Chapter 2: Marine Corps Environmental Management System
- EMSP 12, Monitoring and Measurement
- EMSP13.1 Desktop Procedures for Environmental Compliance
- EMSP-14, Problem Solving
- EMSP-17, Management Review
- WEBCASS User Guide

3.4.3 EMSP-14, Problem Solving

3.4.3.a Purpose and Applicability

This EMSP guides Environmental Affairs Branch personnel in dealing with actual and potential findings to EMS requirements.

3.4.3.b Definitions

None.

3.4.3.c Procedures

The Desktop Procedures for Environmental Compliance, EMSP13.1, is the procedure for managing POA&Ms for each finding identified during an evaluation. The EMS Director is responsible for review of this procedure annually for its effectiveness in meeting EMS commitments.

Write Finding Online (WFO)

Findings are identified during formal ECEs. Findings may also result from sampling, monitoring and measuring and as a result of previous corrective actions that have failed to address deficiencies. Findings will be addressed through projects (internal/external) on WEBCASS program. Once a finding is completed, it should be submitted as a POA&M. POA&Ms can be found in published projects for follow up. Published POA&Ms cannot be deleted from the system. Therefore, findings must be reviewed by the program manager prior to submitting as a POA&M.

The following information must be identified in the program:

- Location
- Guide (e.g. JEGS)
- ECE code (e.g. PO.010.JA –PLANS)
- Summary
- Details (finding responsibility and class)
- Previous findings/Regulatory actions
- WEBCASS and PAI rating
- Root cause
- Corrective action

Persons responsible for the corrective and preventive action will be consulted and assist in the identification of applicable actions. Corrective and preventive action responsibilities will be assigned.

Prior to the closure of a POA&M, the responsible person must ensure that:

- All relevant sections of the WEBCASS POA&M are completed and that information is adequate and accurate;
- All assigned tasks have been completed;
- All assigned tasks and corrective and preventive actions are considered adequate in the mitigation of risk and environmental impacts, and

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- Legal and non-regulatory obligations were adequately addressed and resolved.

If a POA&M cannot be closed, the responsible person must identify additional actions that may include:

- Additional root cause assessment;
- Modification of corrective and preventive actions;
- Additional corrective and preventive actions; and
- Additional review of legal or other obligations.

Observations and Findings Identified Outside the Audit Process

Observations on the EMS may be made during an operational walk-through, monitoring or at any time deemed appropriate. Environmental Affairs Branch personnel will communicate informed observations to the Environmental EMS/Compliance Coordinator. EMSP 13.1.4 Non Compliance Notice Form, may be used to document findings.

Camp Environmental Coordinators will determine if observations are actual finding that must be entered into the WEBCASS program. The Environmental EMS/Compliance Coordinator may elect to track findings informally until the next ECE. If the situation has not been corrected by the next ECE, then it will be formalized.

3.4.3.d References and Related EMS Documents

- MCO P5090.2A, Chapter 2: Marine Corps Environmental Management System
- EMSP-12, Monitoring and Measurement
- EMSP-13, Evaluation of Compliance
- EMSP13.1 Desktop Procedures for Environmental Compliance
- EMSP 13.1.4 Non Compliance Notice Form
- WEBCASS User Guide

3.4.4 EMSP-15, Control of Records

3.4.4.a Purpose and Applicability

This EMSP guides MCB Camp Butler personnel in controlling EMS records.

3.3.5.b Definitions

Environmental Records: Environmental records furnish objective evidence of activities performed or results achieved. Records are statements of fact for a given point in time. They address historical activity and must be maintained for a specified or indefinite period of time. Their contents are not subject to change.

3.3.5.c Procedures

Unless otherwise identified by legal requirement or specific retention requirements referenced within EMS procedures, records retention will follow this general guide: EMS-related records will be retained for at least three years.

Environmental records shall include, at a minimum:

- Training records;
- Audit results;
- Minutes from core team meetings and management reviews;
- All other records required through system procedures and regulatory requirements; and
- Sampling/testing results.

EMSP 15.1 Record inventory Log identifies who is responsible for keeping the records, what form they will be in and how long they will be kept.

3.3.5.d References and Related EMS Documents

- MCO P5090.2A, Chapter 2: Marine Corps Environmental Management System
- EMSP-03, Legal and Other Environmental Requirements
- EMSP-06, Competence, Training and Awareness
- EMSP-07, Communication
- EMSP-10, Operational Control of Practices
- EMSP 15.1 Record Inventory Log

3.4.5 EMSP-16, EMS Audit

3.4.5.a Purpose and Applicability

This EMSP identifies how MCB Camp Butler will conduct EMS audits.

3.4.5.b Definitions

Conformance. A facility is in conformance with established EMS criteria when it meets all applicable EMS requirements, has conducted an internal EMS audit, and self-declares conformance. HQMC-sponsored external audits validate the self-declaration. Note that a facility may be considered to be in conformance with Marine Corps EMS criteria if it has one or more minor non conformances, as long as it establishes and implements a Plan of Action and Milestones (POA&M) to correct each nonconformance.

Major Nonconformance. A systemic weakness within the EMS that indicates the EMS is either failing or close to failure, or an issue that could lead to increased risk to mission. Major non conformances may occur as a result of any of the following:

- Failure to develop an Environmental Management Procedure (EMP) for one of the 17 EMS elements.
- Failure to substantially implement a key procedure.
- Failure to correct, or demonstrate steps to prevent the recurrence of previous nonconformances.
- Multiple (systemic) minor nonconformances noted in one of the 17 EMS elements.
- An issue that is not correctable in a timely manner (no greater than one year) at current funding and/or staffing levels.

Minor Nonconformance. An isolated EMS shortcoming that should not, by itself, cause the EMS to fail or cause an increase in risk to mission. Minor nonconformance may occur as a result of any of the following:

- Failure to address some (but not all) requirements in an installation's procedures.
- Failure to implement some parts of a procedure.
- Inconsistent or inaccurate implementation of a procedure.

3.4.5.c Procedures

MCB Camp Butler will conduct an annual internal EMS audit to assess conformance with the EMS per MCO P5090.2A. Results of the audit will be presented to the CEMRB during the management review process.

EMS third party audits are independent reviews conducted by MCICOM.

EMS audits for conformity may be conducted on tenant activities that are outside the scope of the MCB Camp Butler EMS, but have elected to implement their own EMS. The results of any audit conducted on these activities will be documented.

Reporting

The EMS Conformance Report will be provided to the EMS Manager for review prior to presenting to the EMS Director for self-declaration. Self-declaration reporting practices are identified, in EMSP-12, Monitoring and Measurement.

3.4.5.d References and Related EMS Documents

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- MCO P5090.2A, Chapter 2: Marine Corps Environmental Management System
- EMSP-12, Monitoring and Measurement
- EMSP 13.1 Desktop Procedures for Environmental Compliance
- EMSP-14, Problem Solving
- EMSP-17, Management Review
- WEBCASS User Guide

3.5 MANAGEMENT REVIEW

3.5.1 EMSP-17, Management Review

3.5.1.a Purpose and Applicability

This EMSP identifies the process by which the EMS is assessed for effectiveness and efficiency in meeting the MCIPAC Environmental Policy and improving environmental performance.

3.5.1.b Definitions

None.

3.5.1.c Procedure

The MCB Camp Butler EMS Core Team on behalf of the Commander, MCB Camp Butler guides the implementation and maintenance of the EMS at MCB Camp Butler to ensure sustained conformance with the EMS and to ensure appropriate participation by all commands, units, activities and tenants in the EMS.

The MCB Camp Butler EMS Core Team members are required to:

- Determine a strategy for EMS maintenance.
- Implement the MCIPAC Environmental Policy Statement.
- Ensure all practice owners participate in the practice inventory and agree to reasonable expectations for implementing Environmental Standard Operating Procedures (ESOPs).
- Develop and propose objectives and targets consistent with the MCIPAC Environmental Policy Statement, the risk to mission assessment and installation resources.
- Establish Environmental Action Plans (EAP) for achieving objectives and targets.
- Review and suggest revisions to the installation EMS Manual and EMS procedures.
- Conduct EMS reviews and recommend to the Installation Commander actions to improve the EMS and MCB Camp Butler's environmental performance.
- Oversee the implementation of improvements as directed by the Commander, MCB Camp Butler.
- Perform annual assessment of objectives, targets and supporting risk assessments as appropriate.
- Perform annual assessment of EAPs for achieving objectives and targets and effectiveness of EAP implementation.
- Update EAPs, Environmental Management Programs (EMPs) and the EMS Manual as appropriate to continually improve the MCB Camp Butler EMS.
- Brief chain-of-command on the status of the Core Team activities.

The MCB Camp Butler EMS Core Team consists of the III MEF and Major Subordinate Command Environmental Representatives from the following Commands/Directorates/Departments/Tenant Agencies:

- (1) III Marine Expeditionary Force
- (2) 1st Marine Aircraft Wing
- (3) 3rd Marine Division

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- (4) 3rd Marine Logistics Group
- (5) 31st Marine Expeditionary Unit
- (6) Marine Corps Community Services, MCB Camp Butler
- (7) DLA Disposition Services

Technical Representatives:

- (1) Safety Officer, AC/S, G-7, III Marine Expeditionary Force
- (2) Safety Director MCB Camp Butler
- (3) Environmental Affairs Branch Support Section Supervisor
- (4) EMS Representative, Joint Environmental Material Management Service
- (5) Coordinator, Comprehensive Environmental Training and Education Program (CETEP)
- (6) Environmental Representative, Facilities Maintenance Branch
- (7) Environmental Affairs Branch Program Coordinators as directed by the EMS Manager.

The MCB Camp Butler EMS Manager will chair the EMS Core Team meetings. The MCB Camp Butler EMS Coordinator will support the EMS Core Team by providing technical support as needed. The EMS Coordinator will be involved in most elements of MCB Camp Butler EMS as detailed in the EMS Manual. The EMS Coordinator will serve as the recording secretary of the EMS Core Team.

At a minimum, the EMS Core Team will meet quarterly or as required. Meetings will be called by the EMS Manager and can be requested by any EMS Core Team member. The EMS Core Team is in effect until superseded or revoked by the Commander, MCB Camp Butler. The EMS Core Team will evaluate the continuing effectiveness of the Team during each EMS Review.

The MCB Camp Butler Commander's Environmental Management Review Board (CEMRB) was established to ensure that senior management is aware of, and involved in, continual improvements of MCB Camp Butler's EMS and environmental performance.

The MCB Camp Butler CEMRB will focus on the following objectives:

- Protection of existing land, water and other natural resources on Marine Corps installations in Japan in support of present and future mission requirements.
- Adequately train all Marine Corps personnel responsible for environmental compliance action, and increase awareness among all personnel of the need for environmentally sound conduct.
- Reduce the cost of environmental compliance through appropriate prevention programs, such as hazardous waste minimization efforts and recycling.
- Review the status of MCB Camp Butler EMS by reviewing the status of current objectives and targets and recent EMS and compliance audits.
- Establish and approve objectives and targets annually.
- Implement the MCIPAC environmental policy statement.

The Commander, MCB Camp Butler, will chair the MCB Camp Butler CEMRB. The CEMRB consists of the senior military officer or civilian from the following Commands/Directorates/Departments/Tenant Agencies:

- (1) III Marine Expeditionary Force
- (2) 1st Marine Aircraft Wing

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- (3) 3rd Marine Division
- (4) 3rd Marine Logistics Group
- (5) AC/S, G-3/5, MCB Camp Butler
- (6) AC/S, G-4, MCB Camp Butler
- (7) AC/S, G-F, MCB Camp Butler
- (8) AC/S, Marine Corps Community Services, MCB Camp Butler
- (9) Camp Commander, Camp Foster
- (10) Camp Commander, Camp Courtney
- (11) Camp Commander, Camp Kinser
- (12) Commanding Officer, MCAS Futenma
- (13) Camp Commander, Camp Hansen
- (14) Camp Commander, Camp Schwab
- (15) Camp Commander, Jungle Warfare Training Center
- (16) Counsel, Pacific Area Counsel Office
- (17) Chief, DLA Disposition Services
- (18) Representative, Joint Environmental Material Management Service
- (19) Safety Director, MCB Camp Butler

The board shall meet annually, or as often as necessary to carry out the purpose and objectives of this Board. Prior to each meeting, the MCB Camp Butler EMS Manager will prepare the agenda using input from the Core Team minutes, results of EMS audits and Environmental Compliance Evaluations (ECE) , recommendations from the EMS Core Team, and status on the EMS objectives and targets. The Board may choose to have an open session, where key environmental staff officers may participate, or a closed session where executive decisions are discussed and adopted. Minutes of the session shall be prepared for each meeting of the Board. Board members will brief their commands on the results of the CEMRB. The EMS Manager shall provide appropriate administrative support for the Board.

3.5.1.d References and Related EMS Documents

- MCO P5090.2A, Chapter 2: Marine Corps Environmental Management System
- EMSP-13, Evaluation of Compliance
- EMSP-16, EMS Review